

EXHIBIT G

TAG Report – March 11, 2023



March 11, 2023

Beverly O'Hearn, Attorney at Law
Lueder, Larkin & Hunter, LLC
7 E. Congress St., Suite 712
Savannah, Georgia 31401

Re: *Carolyn Enzor, as Next friend of Kai Enzor and Karter Enzor and Julianne Glisson, Administrator of The Estate of Ka'la Enzor v. The Kroger Co.; In the United States District Court, Southern District of Georgia, Savannah Division, Civil Action No. CV422-083*

Dear Ms. O'Hearn:

Please find attached my report in the above referenced matter. This report may be supplemented as additional discovery is made available and other case activity is completed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Vellani'.

Karim H. Vellani, CPP, CSC

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QUALIFICATIONS

Karim H. Vellani is the President of Threat Analysis Group, LLC, an independent security consulting firm. Karim is Board Certified in Security Management (CPP), a Board-Certified Security Consultant (CSC), and has over 28 years of security management, crime analysis, and forensic security consulting experience. He has a bachelor's degree in Criminal Justice with a specialization in Law Enforcement and a master's degree in Criminal Justice Management. He is the author of three books, *Applied Crime Analysis*, *Strategic Security Management*, *Unraveled: An Evidence-Based Approach to Understanding and Preventing Crime*, and has contributed to a number of other security related books and journals. Karim serves on various research teams conducting evidence-based research on violent crime prevention, workplace violence, sex trafficking, and use of force.

As an independent security management consultant, Karim has been retained by Fortune 500 companies and government agencies. He has extensive experience in risk management and security force protection and provides consultation on a regular basis at government, commercial, and residential facilities across the nation. Karim has worked on projects ranging from data centers, hospitals and healthcare facilities, houses of worship, manufacturing facilities, financial institutions, retailer stores, shopping centers and malls, hotels and motels, office buildings, and residential housing (including Section 8).

For 11 years, Karim was responsible for managing the quality control/assurance function for United States Department of Homeland Security's (DHS) protection force at federal government buildings in 23 states including Mississippi, Alabama, West Virginia, California, Montana, North Dakota, South Dakota, Wyoming, Utah, Nevada, North Carolina, Tennessee, Arizona, Kentucky, Illinois, Washington, Idaho, Texas, Oklahoma, Florida, South Carolina, Rhode Island, and Massachusetts.

Karim specializes in crime analysis and security risk assessment and mitigation. He developed a crime analysis methodology that utilizes the Federal Bureau of Investigation's (FBI) Uniform Crime Report coding system and a proprietary software application called CrimeAnalysisTM. The software allows end users to identify specific threats, select appropriate countermeasures, and reduce their risk. The methodology was originally published in *Applied Crime Analysis* and evolved in *Unraveled: An Evidence-Based Approach to Understanding and Preventing Crime*. Since developing the crime analysis methodology, Karim has assessed crime threats at thousands of facilities. Karim has also developed a Security Risk Assessment Methodology for Healthcare Facilities and Hospitals. In 2009, the International Association of Healthcare Security and Safety (IAHSS) published its Security Risk Assessment Guideline, which was authored by Karim at the request of IAHSS. He was also a Technical Committee Member on the Risk Assessment Standard Development Committee for the American Society for Industrial Security - International (ASIS).



Karim also provides forensic security consulting services to insurance companies and the legal profession. In this work, Karim provides litigation support to attorney's and serves as an expert witness in security related lawsuits. As an Adjunct Professor at the University of Houston - Downtown, Karim taught graduate courses in Security Management and Risk Analysis for the College of Criminal Justice's Security Management Program. He has also trained Police and Security Officers in weapons and use of deadly force and profiling and assisted in the development of maritime security training curriculum compliant with ISPS Code and the United States Coast Guard under the Maritime Transportation Security Act. Karim instructs frequently for the International Association of Professional Security Consultants and ASIS-International.

Karim is a member of the International Association of Professional Security Consultants (IAPSC), ASIS-International, the American Society of Criminology (ASC), American Society of Evidence-Based Policing (ASEBP), the International Association of Crime Analysts (IACA), the International Association of Chiefs of Police (IACP), and the International Association for Healthcare Security & Safety (IAHSS). In the past, Karim served as President of the IAPSC, Director for the IAHSS Foundation and Chair of the Evidence-Based Research Committee. Currently, Karim serves on the IAPSC Forensic Committee and chairs the IAPSC's Evidence-Based Security Practices Committee.

MATERIALS RECEIVED

I reviewed the materials listed below:

1. Plaintiff's Complaint
2. Kroger's Answer
3. Kroger's Discovery Responses
4. Plaintiff's Initial Disclosures (with documents provided)
5. Kroger's Initial Disclosures
6. Plaintiff's Discovery Responses
7. Chatham County Police Department Incident Report No. CC210427020
8. Incident Report for Incident
9. Surveillance Video (DVR 1 Cam 1-14, DVR 2 Cam 9-16, DVR 6 Cam 1-3, 10, 15, 16)
10. Kroger's Loss Prevention (LP) Manual



11. Redacted Copies of Incident Reports Produced to Plaintiff in Discovery
12. Redacted Copy of 645 Case Files Spreadsheet (Security Incidents)
13. Calls for Service (From Plaintiff)
14. Personal Safety Campaign Communications Toolkit
15. CrimeCast Reports 2016 - 2021
16. Associate Handbook Revised 06.27.16
17. Claim File 4.27.21 Incident Report
18. Kroger 645 Security Ratings (2016 to 2021)
19. Videos: Kroger_Berwick_Savannah, Ga_Entrance and Ladies Room (09-29-2022)
20. David Benson Expert Report, Exhibits & Profile
21. Jamie Downs, MD Expert Report & Exhibits
22. Deposition of Alan Johnson
23. Deposition of Carolyn Enzor
24. Kroger Customer Counts, 2018-2021
25. Deposition of Scotlon Hughes (Rough)

In addition to reviewing the foregoing materials, and consistent with the *Forensic Methodology*, I analyzed the crime records produced in this matter and independently requested additional crime records from the Chatham County Sheriff's Office (CCSO) for Kroger 645. The records I received from CCSO can be downloaded using the link below: <https://www.dropbox.com/s/ou6e7i6b2kl5d3/Stats.zip?dl=0>

On February 24, 2023, I interviewed Scotlon Hughes, ASP, Division Assistant AP / Safety Manager.

BACKGROUND

The Subject Incident is the alleged rape¹ of Ka'la Enzor which occurred in a public restroom inside a Kroger grocery store (Kroger 645) on April 27, 2021. Kroger 645 is

¹ Chatham County Police Department Incident Report No. CC210427020



located at 5720 Ogeechee Road, Savannah, Georgia 31405. The Suspect is identified as Gregory Lashun Hathorne. According to the narrative report, Ms. Enzor stated she arrived at Kroger with her boyfriend. She entered the restroom at the front of the store. When she entered the restroom, a woman and child were present. After the woman and child left the restroom, the suspect came out of a stall in the restroom and assaulted her. During the assault, a Kroger employee heard Ms. Enzor scream. The employee called for assistance and then entered the restroom with another Kroger employee. Store Manager Timothy Edwards was about to enter the restroom as well when Suspect Hathorne ran out.²

CRIME RISK

As a security consultant and crime analyst, I have spent over 28 years developing specialized knowledge of crime analysis and its associated techniques. Using this specialized knowledge, I have assessed crime risks for private sector companies, industry associations, and government agencies. I have given presentations at industry conferences and written book chapters, articles, journal articles, and three books on the topic of crime analysis and security risk mitigation (see Appendix A: Curriculum Vitae of Karim Vellani).

Consistent with my education, training, and experience, I applied a methodology first developed in 1929 by the Federal Bureau of Investigation (FBI) called the Uniform Crime Reporting (UCR) methodology to assess the crime risk at Kroger 645. This methodology is commonly used by criminologists, security consultants, crime analysts, researchers, and organizations to assess crime risk, and it is referenced in the peer-reviewed, consensus-based *Forensic Methodology* published by the International Association of Professional Security Consultants (IAPSC).

I assessed the crime risk at Kroger 645 ("Subject Place") using four factors - **similarity**, **frequency**, **recency**, and **proximity**. These factors were considered with additional guidance from industry accepted practices and governmental sources.

Recency and Proximity

The *Forensic Methodology* addresses both time (**recency**) and distance (**proximity**) in assessing crime at a Place (the Subject Place at issue in this matter is Kroger 645), specifically:

When assessing actual threats, the following may be considered as *deemed relevant by the security expert*:

² Chatham County Police Department Incident Report No. CC210427020

- a. Relevant crimes on the **subject property** for a **three to five-year period** prior to the date of the incident.
- b. Relevant crimes in the **immediate vicinity** of the subject property for a **three to five-year period** prior to the date of the incident.³

As a matter of practice, I use three (3) calendar years prior to the Subject Incident and up to the date of the incident in the subject year of the incident. Variances may occur when additional time periods are available through discovery or when police departments cannot provide the full timeframe requested.

With regard to area crime (**proximity**), the *Forensic Methodology* further states:

- a. There is no single definition of what constitutes an “immediate vicinity” or “neighborhood” around a given property. Often what is available for evaluation from a law enforcement agency depends upon that agency’s software programming and/or staff capabilities (e.g., the agency can only provide data for a set size of an area, such as a quarter mile radius).
- b. The IAPSC recognizes that criminology studies and related research have generally found that crime in the area may or may not be relevant to the subject property.⁴

In criminology, the term “Place” (or “Proprietary Place”) is used to signify small areas that are typically under the management of one entity or a small group of entities. A Place has five characteristics:

1. It is very small (i.e. one address, one land parcel, one building, etc.);
2. It has a known geographic location;
3. It is contained within defined property boundaries;
4. It serves one general function (e.g. the Place provides housing, sells groceries, serves food, provides healthcare, etc.); **and**

³ See Appendix B (bold added)

⁴ See Appendix B

5. It has an owner who has the authority to legally control the use of the Place, including the power to exercise a broad range of controls over the use of the Place.⁵

In criminology, there is no generally accepted definition of “neighborhood,” “area,” “immediate area,” “immediate vicinity,” or “close proximity” (collectively referred to as “Area”). Area, as it is discussed in research, ranged in size from one block to several miles and intervals in between. In some instances, the distance was measured as a radius around a Place while in others it was measured in a linear manner (e.g. half-mile in both directions of a street).

The idea of a “high crime neighborhood” is misleading. Crime in an area, such as a neighborhood, is not evenly distributed. Some *Places* within a neighborhood have a lot of crime. Most *Places* have little or no crime. This is true in both “good” and “bad” neighborhoods. Understanding crime at *Place* is important for preventing crime. This has been empirically known for over 30 years.

Those unfamiliar with evidence-based criminological research may use a one-mile radius (an area of 3.14 square miles) or a two-mile radius (an area of 12.57 square miles) around a Place and improperly assume that all crime in that Area is additive to the crime risk of the Place and without consideration of the population density of the Area. An arbitrarily selected radius can skew the crime analysis positively or negatively. The arbitrariness of radius selection impacts accuracy and is sometimes done to “garner attention based solely on the fact that they produce attractive maps that are user-friendly.”⁶ Other research identified key problems with the use of radii:

*Few physical targets take the shape of a sphere and so most likely will differ from the morphology of radial buffer. The second issue is that buffer zones tend to be uniform, equidistant from the object they are buffering. Using a concentric buffer zone in this way assumes that diffusion takes place in equal distributions around an object. It does not seem likely, however, that crime would be diffused uniformly.*⁷

⁵ Eck, John E. (2018). “Regulation for High-Crime Places: Theory, Evidence, and Principles.” The ANNALS of the American Academy of Political and Social Science. Volume 679, Issue 1. Sage Publications.

⁶ Chainey, S., Tompson, L., & Uhlig, S. (2008). The utility of hotspot mapping for predicting spatial patterns of crime. Security Journal, 21, 4-28

⁷ Murray, R., & Roncek, D. (2008). Measuring diffusion of assaults around bars through radius and agency techniques. Criminal Justice Review, 33(2), 199-220.

Thus, to use an arbitrary radius ignores criminological evidence and creates logistical challenges for calculating crime rates (often needed for the **frequency** element discussed below).

Routine Activity Theory is useful for explaining the basic components of crime. It posits that for a crime to occur, three necessary elements must converge in time: a motivated offender, a target/victim lacking guardianship, and a **Place**.⁸ This is illustrated in the inner triangle of the Problem Analysis Triangle below.



While the inner triangle shows the necessary components that need to converge in time for a crime to occur, the outer triangle shows *Controllers*. Controllers can influence crime prevention. Controllers may have a direct impact on the crime, but more often have an indirect role in crime. There are three types of Controllers: Handlers, Guardians, and Place Managers. *Handlers* (e.g. parents, probation officers, society, etc.) influence *Offenders*. *Guardians* (e.g. oneself, bystanders, neighbors, etc.) protect *Victims*. Most guardianship is self-guardianship, that is, people taking action to protect themselves.⁹ *Managers* (e.g. homeowner, property manager, etc.) control *Places*.

⁸ Cohen, L. E., & Felson, M. (1979). Social Change and Crime Rate Trends: A Routine Activity Approach. *American Sociological Review*, 44(4), 588–608. <https://doi.org/10.2307/2094589>

⁹ Sampson, R., Eck, J. & Dunham, J. Super controllers and crime prevention: A routine activity explanation of crime prevention success and failure. *Secur J* 23, 37–51 (2010). <https://doi.org/10.1057/sj.2009.17>

Analyzing crime in large areas is inconsistent with Routine Activity Theory and other aspects of *Crime Science*.¹⁰ Studying crime at geographic units bigger than a Place may mask the variability of crime at subject Places and may misrepresent the risk.¹¹ Places are “only loosely coupled to their contexts: they have internal mechanisms that allow them to operate mostly independent from their surroundings.”¹² Consequently, correlations drawn from Areas can be misleading in drawing conclusions about Places.¹³

Furthermore, criminology has shown that crime in an Area is not *additive* to the crime risk of a Place. However, Area crime can be used for *comparative* purposes. Specifically, a Place could be compared to other Places with similar characteristics in the Area.¹⁴ A retail store could be compared to other retail stores with similar characteristics (i.e. sells groceries) in the Area. Likewise, an apartment complex could be compared to other Area apartment complexes with similar characteristics. Characteristics of an apartment complex may include type (e.g. garden style, mid-rise, high rise, etc.), rental rate (e.g. market, subsidized), size (e.g. number of units), and management style.¹⁵ Comparing dissimilar Places, however, is inappropriate.^{16 17}

Advancements in data collection by law enforcement agencies has created a wealth of data for researchers to analyze. As a result, criminology has concluded that crime is highly concentrated at specific Places. The fact that crime is highly concentrated at specific Places and that crime is *situationally specific* is supported by a large body of

¹⁰

<https://oxfordre.com/criminology/criminology/view/10.1093/acrefore/9780190264079.001.0001/acrefore-9780190264079-e-4>

¹¹ Weisburd, David, Elizabeth Groff and Sue-Ming Yang. (2012), *The Criminology of Place: Street Segments and Our Understanding of the Crime Problem*. Oxford: Oxford University Press.

¹² Madensen, Tamara D. and John E. Eck (2013). "Crime Places and Place Management" in Cullen, F. T., & Wilcox, P. *The Oxford Handbook of Criminological Theory*. New York, NY: Oxford University Press.

¹³ Weisburd, David, et al. (2016), *Place Matters: Criminology for the Twenty-First Century*. Cambridge: Cambridge University Press.

¹⁴ Weisburd, David, et al. (2016), *Place Matters: Criminology for the Twenty-First Century*. Cambridge: Cambridge University Press.

¹⁵ Bruinsma, G., Johnson, S., Eck, J., & Madensen, T. (2018-09-14). *Place Management*. In *The Oxford Handbook of Environmental Criminology*. : Oxford University Press.

¹⁶ Eck, John & Guerette, Rob. (2012). "Own the Place, Own the Crime" Prevention. 10.1093/acprof:oso/9780199917938.003.0021.

¹⁷ Vellani, Karim H. (2021). *Unraveled: An Evidence-Based Approach to Understanding and Preventing Crime*. Sugar Land, TX: Threat Analysis Group, LLC.

research dating back to 1989 and is widely accepted.^{18 19 20 21} As a result, the scientific examination of crime has shifted away from the study of Areas and toward the study of Places using the smallest available spatial unit of analysis.²²

Similarity and Frequency

The United States Department of Justice, specifically the FBI and the Bureau of Justice Statistics ("BJS"), provide guidance regarding the assessment of crime **similarity** and **frequency**. The FBI collects crime data for specific crimes and categorizes them using the Uniform Crime Report (UCR) methodology.²³ The FBI's UCR methodology categorizes crimes as violent crimes, property crimes, and disorder crimes.²⁴ In broad terms, crimes of a similar nature to the Subject Incident are those categorized as violent crime, which include murder, rape, robbery, and aggravated assault. However, more specificity is needed to fully identify and understand a crime problem.

Criminologists, Ronald V. Clarke and John E. Eck, admonish that "problems need to be examined with great specificity because small details can make a difference between a set of circumstances that gives rise to harmful events, and a set of circumstances producing harmless events."²⁵ Regarding *similarity*, Drs. Eck and Clarke state:

Similarity. The recurring events must have something in common. They may be committed by the same person, happen to the same type of victim, occur in the same types of locations, take place in similar circumstances, involve the same type of weapon, or have one or more other factors in common. Without common features, you have an arbitrary collection of events, not a problem. Common crime classifications—such as used by the Uniform Crime Reports—are not helpful. Vehicle theft, for example, includes

¹⁸ Madensen, Tamara D. (2010). "Eck, John E.: Places and the Crime Triangle." Encyclopedia of Criminological Theory, SAGE Publications, Inc., Thousand Oaks.

¹⁹ Madensen, Tamara D. and John E. Eck (2013). "Crime Places and Place Management" in Cullen, F. T., & Wilcox, P. The Oxford Handbook of Criminological Theory. New York, NY: Oxford University Press.

²⁰ Gotham, K.F. & Kennedy, D.B. Secur J (2019). <https://doi.org/10.1057/s41284-019-00218-1>

²¹ Drawve, Grant & Harris, Casey & Thomas, Shaun & Datta, Jyotishka & Cothren, Jackson. (2020). Current and New Frontiers: Exploring how Place Matters through Arkansas NIBRS Reporting Practices. Crime & Delinquency. 10.1177/0011128720974317.

²² Weisburd, David, Elizabeth Groff and Sue-Ming Yang. (2012), The Criminology of Place: Street Segments and Our Understanding of the Crime Problem. Oxford: Oxford University Press.

²³ <https://ucr.fbi.gov/>

²⁴ A recent enhancement to the UCR's underlying reporting system added a category called crimes against society and added additional crimes to the former categories (e.g. human trafficking). The new enhancements have not been fully operationalized across the country.

²⁵ Clarke, R. V., & Eck, J. E. (2016). Crime analysis for problem solvers in 60 small steps. Office of Community Oriented Policing Services.

*joyriding, thefts for chop shops, thefts for export to other countries, thefts for use in other crimes, and a host of other dissimilar events. So a cluster of vehicle thefts may not be a single problem. More information is needed. With common features, we have a pattern of events that could indicate a problem—for example, thefts of minivans in suburban neighborhoods to be used as gypsy cabs in the inner city.*²⁶

Property crimes, as defined by the FBI, include burglary, theft, auto theft, and arson. Property crimes are dissimilar to violent crimes. Property crimes are not typically used to assess the risk of violent crime because property crimes pose different concerns and may require the application of different security measures. There is no scientific basis for predicting stranger violent crimes based on prior property crimes.²⁷ Similarly, disorder crimes (e.g. criminal mischief) and non-crimes (e.g. found person) should also not be included in the analysis.²⁸ Furthermore, research has shown that property crimes escalate into violent crimes at a low rate. Thus, when assessing violent crime risks retrospectively (as required by the Forensic Methodology), the inclusion of property crimes is inappropriate if the objective is to assess similar crimes. Therefore, any property crime that escalated into a violent crime is already counted as a violent crime in the historical crime data.

The Forensic Methodology states, “The expert may consider the relationship between offenders and victims (e.g. interpersonal, domestic, targeted, etc.).” When assessing the crime risk of a Place, it is important to distinguish crimes which pose a threat to the general users of the Place versus those that pose a risk to specific individuals. The Department of Justice defines two types of crime categories based on the relationship of the offender and victim:

- a. “Stranger” (also known as “Stranger-Initiated”) is a classification of the victim's relationship to the offender for crimes involving direct contact between the two. Incidents are classified as involving strangers if the victim identifies the offender as a stranger, did not see or recognize the offender, or knew the offender only by sight. Crimes involving multiple offenders are classified as involving non-strangers if any of the offenders was a non-stranger. Since victims of theft without contact rarely see the offender, no distinction is made between strangers and non-strangers for the crime.

²⁶ Clarke, R. V., & Eck, J. E. (2016). Crime analysis for problem solvers in 60 small steps. Office of Community Oriented Policing Services.

²⁷ Sherman, Lawrence W. (1989). Violent Stranger Crime at a Large Hotel: A Case Study in Risk Assessment. Security Journal 1:40-46.

²⁸ Vellani, Karim H. (2021). Unraveled: An Evidence-Based Approach to Understanding and Preventing Crime. Sugar Land, TX: Threat Analysis Group, LLC.

- b. "Non-Stranger" (also known as "Interpersonal") is a classification of a crime victim's relationship to the offender. An offender who is either related to, well known to, or casually acquainted with the victim is a non-stranger. For crimes with more than one offender, if any of the offenders are non-strangers, then the group of offenders as a whole is classified as non-stranger. This category only applies to crimes which involve contact between the victim and the offender; the distinction is not made for crimes of theft since victims of this offense rarely see the offenders.

Non-Stranger crimes are more difficult to prevent than Stranger crimes and typical security measures are not often effective against Non-Stranger crimes.²⁹ Security programs are usually not designed to deter or prevent Non-Stranger crimes, though intervention once the crime is underway is possible. When assessing similarity of crimes, only prior Stranger violent crimes should be analyzed for purposes of identifying the general crime risk at a Place. As stated by criminologist Lawrence W. Sherman:

*A standard distinction among violent crimes is the relationship between the victim and the offender. In a crime where the victim and the offender are acquainted, as in a wife-beating, its occurrence may be predictable from their relationship. It is not usually predictable as to place of occurrence, however, especially in public places. There is apparently no reasonable way for the operator of a business to foresee that previously acquainted persons will enter the premises and commit violent acts against each other.*³⁰

There is no scientific basis for predicting stranger violent crimes based on prior non-stranger violence.³¹

Frequency is usually measured via crime patterns, crime trends, and crime rates:

- Crime Pattern - two or more incidents related by a common causal factor, usually to do with the offender, location, or target. Patterns are usually, but not always, short term phenomena.³²

²⁹ Army, Christine, & Vellani, Karim H. (2021). Violent Crime Typology and Continuum. CrimRxiv. <https://doi.org/10.21428/cb6ab371.71ec923d>

³⁰ Sherman, Lawrence W. (1989). Violent Stranger Crime at a Large Hotel: A Case Study in Risk Assessment. Security Journal 1:40-46.

³¹ Sherman, Lawrence W. (1989). Violent Stranger Crime at a Large Hotel: A Case Study in Risk Assessment. Security Journal 1:40-46.

³² International Association of Crime Analysts (2009). Exploring Crime Analysis, Second Edition. Overland Park: International Association of Crime Analysts.

- Crime Trend - a specific type of pattern that has a general direction or tendency. In practice, a trend often has a time component (e.g. crime by day or week, time of day, etc.) and is represented as an increase or a decrease in a given phenomenon over time.³³
- Crime Rate - the ratio of crimes in an area to the population of that area. Crime rates are typically expressed per 1,000 population per year. A crime rate provides context to a crime volume.³⁴ "A rate of anything consists of two numbers: the numerator, or number of occurrences, and the denominator, or number of units in which the occurrences are possible. Thus, auto accident rates are sometimes described in terms of accidents per 100,000 vehicle miles traveled and plane crash deaths are divided by the number of passenger miles traveled."³⁵

"Even with a very high relative risk of crime, it is possible for security measures to be adequate and reasonable."³⁶

Analysis of Crime at Kroger 645

In accordance with the *Forensic Methodology*, and using the techniques described above, the Chatham County Sheriff's Office (CCSO) incident data and Offense/Incident Reports were used to assess the general crime threat at Kroger 645 and specifically the threat of stranger violent crime at Kroger 645.

The table below summarizes the incidents at Kroger 645 between February 1, 2018 and April 27, 2021. January 2018 data were not available.

Offense Report #	Incident Type	Date	Time
CC180402021	DISORDERLY CONDUCT	4/2/2018	14:33
CC180402019	LARCENY - FROM BUILDING	4/2/2018	14:15
CC180408022	SHOPLIFTING	4/8/2018	16:12
CC180426040	SHOPLIFTING	4/23/2018	17:39
CC180429014	SHOPLIFTING	4/29/2018	12:50
CC180505027	AGGRAVATED ASSAULT/BATTERY -	5/5/2018	18:15
CC180906019	FRAUD - ILLEGAL USE OF	5/20/2018	12:00

³³ Police Executive Research Forum

³⁴ Vellani, Karim H. and Joel D. Nahoun (2001). *Applied Crime Analysis*. Woburn: Butterworth-Heinemann.

³⁵ Sherman, Lawrence W. (1989). Violent Stranger Crime at a Large Hotel: A Case Study in Risk Assessment. *Security Journal* 1:40-46.

³⁶ Sherman, Lawrence W. (1989). Violent Stranger Crime at a Large Hotel: A Case Study in Risk Assessment. *Security Journal* 1:40-46.

CC180528002	SHOPLIFTING	5/28/2018	01:00
CC180601024	LARCENY - SUDDEN SNATCHING	6/1/2018	18:04
CC180602032	SHOPLIFTING	6/2/2018	18:50
CC180605008	THEFT OF AUTOMOBILE	6/4/2018	12:00
CC180609022	SHOPLIFTING	6/9/2018	19:13
CC180624005	FORGERY - OF OTHER OBJECT	6/23/2018	23:00
CC180708032	SEXUAL ASSAULT OFFENSE FREE TEXT	7/8/2018	18:12
CC180712008	THEFT OF LOST/MISLAID PROPERTY	7/12/2018	11:00
CC180714033	SHOPLIFTING	7/14/2018	17:38
CC180727027	LARCENY - FROM BUILDING	7/27/2018	22:33
CC180728031	THEFT BY SHOPLIFTING	7/28/2018	18:17
CC180805012	DISORDERLY CONDUCT	8/5/2018	13:53
CC180805012	SIMPLE ASSAULT/BATTERY	8/5/2018	13:53
CC180814021	AGGRAVATED ASSAULT/BATTERY -	8/14/2018	17:59
CC180823026	HARASSING COMMUNICATION	8/22/2018	18:00
CC180916027	LARCENY OFFENSE FREE TEXT	9/16/2018	17:59
CC181012033	SHOPLIFTING	10/12/2018	20:02
CC181107048	SIMPLE ASSAULT/BATTERY	11/7/2018	22:06
CC181118013	DANGEROUS DRUGS OFFENSE FREE	11/18/2018	15:40
CC181118013	LARCENY - FROM BUILDING	11/18/2018	15:40
CC181120001	SHOPLIFTING	11/19/2018	23:50
CC181128026	ASSAULT/BATTERY OFFENSE FREE TEXT	11/28/2018	21:59
CC181128026	SHOPLIFTING	11/28/2018	21:59
CC181223013	SHOPLIFTING	12/23/2018	12:43
CC181227005	FRAUD - ILLEGAL USE OF	12/24/2018	00:00
CC190105017	SHOPLIFTING	1/5/2019	13:11
CC190116024	LARCENY - PARTS FROM VEHICLE	1/15/2019	17:00
CC190117030	SHOPLIFTING	1/17/2019	12:30
CC190121014	LARCENY - FROM BUILDING	1/21/2019	14:00
CC190130016	SHOPLIFTING	1/21/2019	14:15
CC190203013	SHOPLIFTING	2/3/2019	10:03
CC190205009	SHOPLIFTING	2/5/2019	13:40
CC190212045	FRAUD - ILLEGAL USE OF	2/12/2019	19:00
CC190322009	SHOPLIFTING	3/22/2019	07:19
CC190504037	HARASSING COMMUNICATION	5/4/2019	16:20
CC190526016	SHOPLIFTING	5/26/2019	13:00
CC190528012	LARCENY - FROM BUILDING	5/28/2019	09:00
CC190728033	LARCENY - SUDDEN SNATCHING	7/28/2019	21:31
CC190926023	SIMPLE ASSAULT/BATTERY	9/26/2019	16:00
CC191022019	SHOPLIFTING	10/22/2019	13:20
CC191118040	LARCENY OFFENSE FREE TEXT	11/18/2019	16:30
CC191212017	SHOPLIFTING	12/12/2019	14:20
CC200309025	FRAUD - ILLEGAL USE OF	12/13/2019	00:01
CC191217001	SHOPLIFTING	12/16/2019	23:49

CC191217028	SHOPLIFTING	12/17/2019	18:00
CC191229043	LARCENY OFFENSE FREE TEXT	12/29/2019	22:45
CC191231023	LARCENY - FROM BUILDING	12/31/2019	13:45
CC200109032	DISORDERLY CONDUCT	1/9/2020	19:44
CC200124002	HARASSING COMMUNICATION	1/24/2020	07:50
CC200125002	LARCENY - ARTICLES FROM VEHICLE	1/24/2020	23:45
CC200209009	METHAMPHETAMINES - POSSESSION	2/9/2020	08:47
CC200224015	SHOPLIFTING	2/24/2020	10:58
CC200412017	SIMPLE ASSAULT/BATTERY	4/12/2020	12:00
CC200417004	SHOPLIFTING	4/17/2020	13:55
CC200504016	AGGRAVATED ASSAULT/BATTERY -	5/4/2020	12:10
CC200530012	LARCENY - ARTICLES FROM VEHICLE	5/30/2020	13:32
CC200530012	LARCENY - ARTICLES FROM VEHICLE	5/30/2020	13:32
CC200606030	DISORDERLY CONDUCT	6/6/2020	23:12
CC200702033	SHOPLIFTING	7/2/2020	19:00
CC200707026	SHOPLIFTING	7/7/2020	19:25
CC200908001	SHOPLIFTING	9/7/2020	23:50
CC201002004	SHOPLIFTING	10/2/2020	08:30
CC201010013	SHOPLIFTING	10/8/2020	17:55
CC201112035	SIMPLE ASSAULT/BATTERY	11/12/2020	20:36
CC201114009	SHOPLIFTING	11/14/2020	07:48
CC201216015	FRAUD - ILLEGAL USE OF	12/16/2020	13:00
CC201216015	LARCENY - FROM BUILDING	12/16/2020	13:00
CC210124014	DRIVING UNDER THE INFLUENCE OF	1/24/2021	11:16
CC210124011	DRIVING UNDER THE INFLUENCE OF	1/24/2021	12:11
CC210127025	LARCENY - FROM BUILDING	1/27/2021	15:32
CC210319033	SHOPLIFTING	3/19/2021	19:00
CC210324032	WEAPONS VIOLATION OFFENSE FREE	3/24/2021	18:00
CC210325036	SHOPLIFTING	3/26/2021	21:20
CC210427020	RAPE - STRONGARM	4/27/2021	18:48

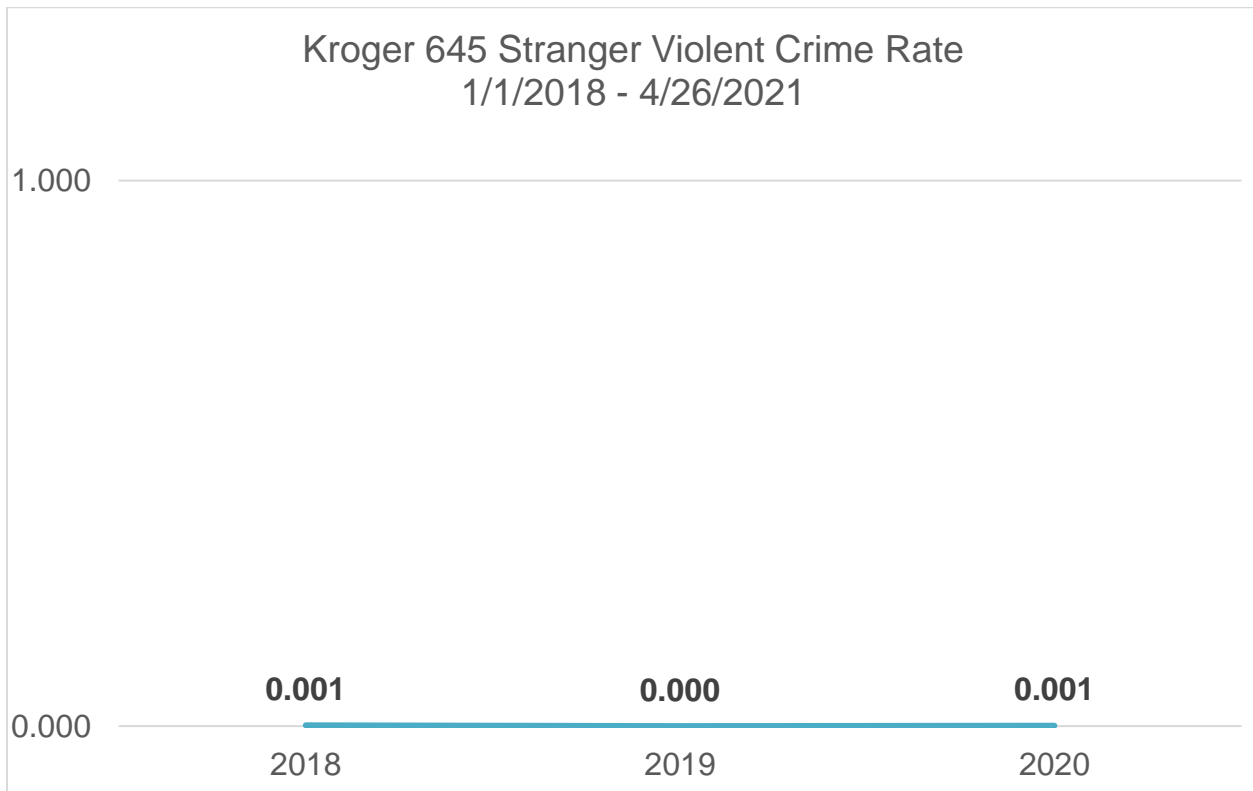
The table below summarizes a subset of the above data pertaining specifically to stranger violent crimes at Kroger 645. This data indicates that there were three prior stranger violent crimes at Kroger 645; however, all three of these incidents occurred in the parking lot unlike the Subject Incident.

Offense Report #	UCR Crime	Date	Time	Location	Details
CC180505027	Aggravated Assault	5/5/2018	18:15	Outside	An unknown male spit on complainant and almost struck complainant with his vehicle
CC180814021	Aggravated Assault	8/14/2018	17:59	Outside	Complainant stated a subject pulled out a weapon during an altercation in the parking lot

CC200504016	Aggravated Assault	5/4/2020	12:10	Outside	Complainant stated a subject cut her after a minor vehicle accident in the parking lot; There is a TKC Case File for this Incident
CC210427020	Rape	4/27/2021	18:48		Subject Incident

As defined above, a Crime Rate is the ratio of crimes in an area to the population of that area. Crime rates are typically expressed per 1,000 population per year. Crime rates are a measure of crime frequency and provide context to absolute crime levels. Crime rates describe the number of crimes per target at risk during a period of time.³⁷ Crime rates help crime analysts and others understand the criminogenic nature of places and areas by way of an objective, scientifically acceptable method to assess the risk of specific crimes at specific places.³⁸ The formula for calculating a violent crime rate is ***Violent Crime Rate = (Total Violent Crime / Population) x 1,000***.

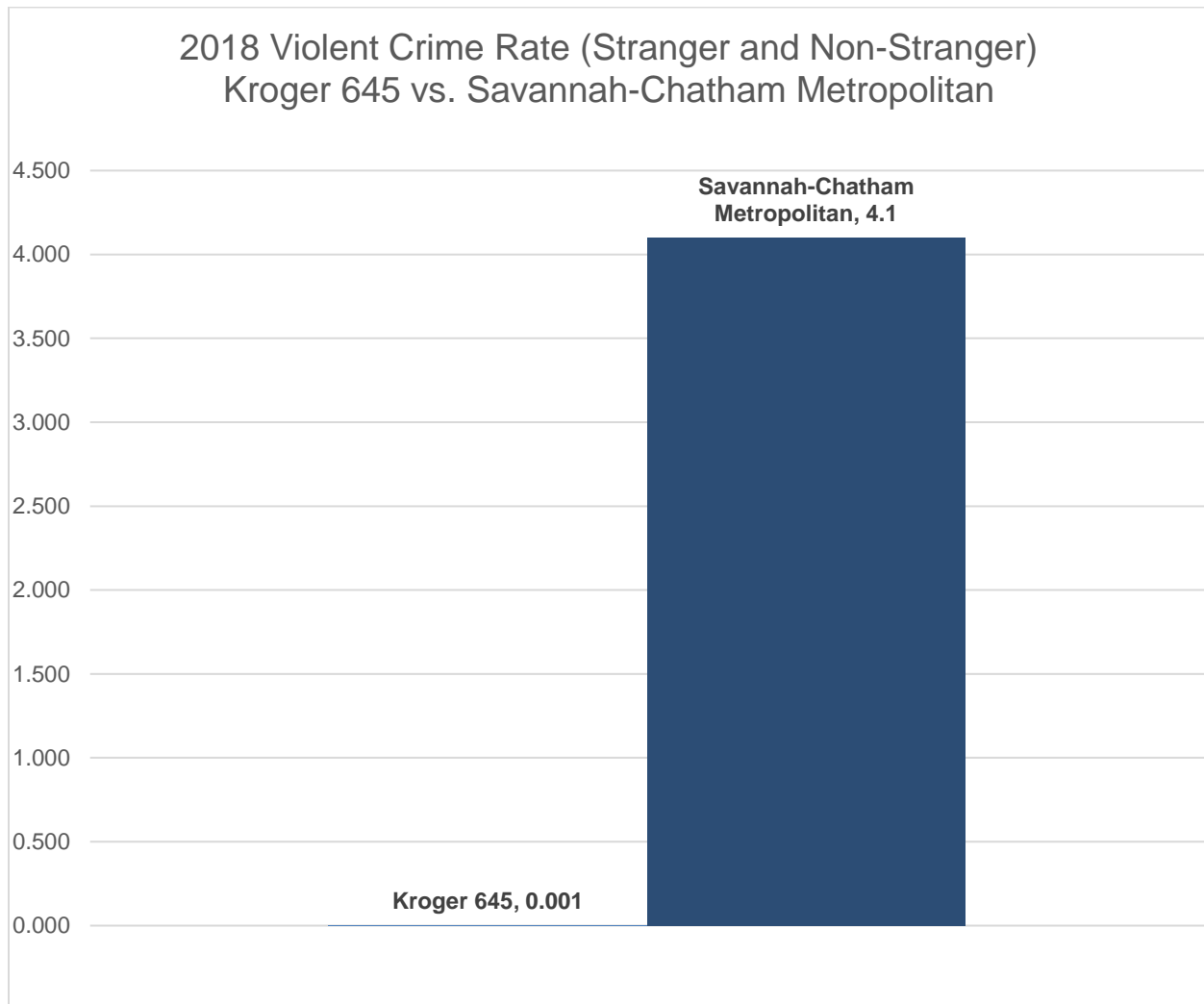
As seen the chart below, Kroger 645 had a low stranger violent crime rate in the three years preceding the Subject Incident.



³⁷ Clarke, Ronald V. and John E. Eck. (2016). *Crime Analysis for Problem Solvers in 60 Small Steps*. Washington, DC: Office of Community Oriented Policing Services.

³⁸ Gotham, K.F. & Kennedy, D.B. *Secur J* (2019). <https://doi.org/10.1057/s41284-019-00218-1>

According to data provided by the Federal Bureau of Investigation via the Uniform Crime Report program, Kroger 645 has a lower risk of violent crime than Chatham County.³⁹



Inherent Threats

The analysis I conducted included the assessment of inherent threats as required by the *Forensic Methodology*. Inherent threats consider “the crime risk at the subject property as determined by the expert based on the property’s characteristics, the expert’s research and/or experience in similar environments, information gathered through the discovery process, and/or a site inspection (if conducted).” Rapes are not an inherent threat in grocery stores.

³⁹ Only 2018 data was used as Chatham County did not report to the Uniform Crime Report program from 2019 to 2021.

Kroger Incident Reporting

The only *crime against a person* noted in Kroger's LPMS database, dating back to May 5, 2016, was an Assault, reported into the system on May 4, 2020. Kroger Incident Reports reflect two additional incidents prior to the Subject Incident. The first incident was a fight between customers outside the store which was reported on March 22, 2016. The other incident was reported on November 8, 2018 and involved an assault by a customer on another customer inside the store. This incident apparently involved a minor child with autism.⁴⁰ Further, Kroger is not aware of any prior assaults in the restroom of Kroger 645.⁴¹

ANALYSIS

Kroger divides up its stores into Divisions and Districts. Kroger 645 is in the Atlanta Division. The Atlanta Division had 183 stores in Georgia, South Carolina, and Alabama at the time of the Subject Incident. The Atlanta Division's budget provides funding for security measures. Kroger allocates security resources to stores based on risk. Risk was identified using a comprehensive security risk assessment methodology called a Security Matrix. The Security Matrix incorporates both internal and external risk data sources which provide an objective analysis of the risk at Kroger stores, including Kroger 645. The Security Matrix is used, in part, to assess a store's need for security personnel.⁴²

The Security Matrix has evolved over time. In 2021, the Security Matrix was composed of a CAP Index score, Loss Prevention Management System (internal security reporting) data, and shrinkage data.⁴³ The Security Matrix results in a qualitative risk rating: Low, Medium, High, and Max. In 2020, Kroger 645 was categorized as medium according to the Security Risk Model.⁴⁴ ⁴⁵ Division Asset Protection Managers (DAPM) have further input regarding risk and can make decisions regarding the use of contract Security Personnel and whether they are armed, unarmed, off-duty police, and the schedule. The DAPM's knowledge about a store and emerging incidents drive the decision to use

⁴⁰ Deposition of Scotlon Hughes (Rough)

⁴¹ Interview of Scotlon Hughes, ASP, Kroger's Division Assistant Asset Protection and Safety Manager, February 24, 2023

⁴² Interview of Scotlon Hughes, ASP, Kroger's Division Assistant Asset Protection and Safety Manager, February 24, 2023

⁴³ Shrinkage is a retail term which describes when a store has fewer items in stock than in its recorded book inventory.

⁴⁴ Kroger 645 Security Ratings (2016 to 2021).xlsx

⁴⁵ Interview of Scotlon Hughes, ASP, Kroger's Division Assistant Asset Protection and Safety Manager, February 24, 2023



contract Security Personnel based on an overall budget provided by the Kroger General Office.⁴⁶

In addition to the Kroger General Office's security guidance, Kroger's Division Asset Protection Manager, Assistant Division Asset Protection Manager, and District Asset Protection Manager develop and implement security measures at Kroger stores in the Atlanta Division, including Kroger 645. These measures include access control, video surveillance, electronic article surveillance, parking lot lighting, buggy locks, a Loss Prevention Reference Manual, and employee training. In addition, Kroger employees are provided active shooter training, general security training, reporting requirements. Employees are the eyes and ears of the store. Store management makes decisions to call for a police response to minor incidents (e.g. disorderly, suspicious persons) and/or more serious incidents. The Kroger Store Manager receives enhanced Asset Protection and Safety training thru Management Training.^{47 48}

Store 645 had both interior and exterior cameras.⁴⁹ Several people, including Kroger employees, can be seen on video entering and exiting the hallway leading to the restrooms, in the minutes before the Subject Incident. Suspect Hathorne made no effort to conceal his identity, despite the presence of people and cameras in the area. Suspect Hathorne could have worn a mask, like many other people on video, due to the COVID-19 pandemic and conceal his identity.

OPINIONS

My opinions relate to the foreseeability of crime developed from evidence-based research and my experience consulting with businesses across the country. As a security consultant and crime analyst, I have spent over 28 years developing specialized knowledge regarding security and crime prevention. During that time, I have reviewed security guidelines, standards, best practices, and criminological research which inform my opinions and assist in my evaluation of crime risk at places similar to Kroger 645.

Using this specialized knowledge, I have written three books and numerous articles on crime analysis, security, and crime prevention and presented on these topics at industry conferences. I have also developed, in collaboration with other experts, security and

⁴⁶ Interview of Scotlon Hughes, ASP, Kroger's Division Assistant Asset Protection and Safety Manager, February 24, 2023

⁴⁷ The Kroger Co.'s Response to Plaintiffs' Interrogatories

⁴⁸ Interview of Scotlon Hughes, ASP, Kroger's Division Assistant Asset Protection and Safety Manager, February 24, 2023

⁴⁹ Interview of Scotlon Hughes, ASP, Kroger's Division Assistant Asset Protection and Safety Manager, February 24, 2023



crime prevention standards, guidelines, and best practices for three major security industry associations. I have chaired committees for security industry associations which developed evidence-based research regarding the efficacy of security measures in prevention violent, property, and disorder crime. Please see my Curriculum Vitae (Appendix A) for specific details.

In arriving at my opinions in this case, I adhered to the consensus-based, published, and peer-reviewed *Forensic Methodology* (Appendix B) promulgated by the International Association of Professional Security Consultants (IAPSC). For all the reasons set forth throughout this report, my opinion with respect to this matter are as follows:

1. In light of the crime risk, Kroger 645 had a reasonable security program which consisted of a multi-pronged approach to mitigating risk. Defendants met the applicable standard of care relating to security.

PUBLICATIONS

Army, Christine, & Vellani, Karim H. (2023). Risky Behaviors and Violent Victimization (EBSP-23-01). Evidence-Based Security Practices, International Association of Professional Security Consultants.

Vellani, Karim H., & Kristof, Tina S. (2022). "Security's Critical Role In Combating Sex Trafficking." Journal of Healthcare Protection Management, Volume 76, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2021). Unraveled: An Evidence-Based Approach to Understanding and Preventing Crime. Sugar Land, TX: Threat Analysis Group, LLC.

Vellani, Karim H. (2021). "Mitigating Security Risks with Evidence-Based Research." Hospital Association of Southern California, November 3, 2021.

Army, Christine, & Vellani, Karim H. (2021). Violent Crime Typology and Continuum. CrimRxiv. <https://doi.org/10.21428/cb6ab371.71ec923d>

Vellani, Karim H., & Kristof, Tina S. (2021). Identifying and Responding to Sex Trafficking Victims in Healthcare Environments. CrimRxiv. <https://doi.org/10.21428/cb6ab371.84ddfc71>

Vellani, Karim H. and Tina S. Kristof (2021). "Results of the 2020 Healthcare Crime Survey." Journal of Healthcare Protection Management, Volume 36, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H.; Bryan Warren; Jeff Young (2020). "The Impact of COVID-19 on Healthcare Facilities." International Association of Healthcare Security and Safety, October 28, 2020.

Pompeii, Lisa, Elisa Benavides, Oana Pop, Yuliana Rojas, Robert Emery, George Delclos, Christine Markham, Abiodun Oluyomi, Karim Vellani, Ned Levine (2020). Workplace Violence in Outpatient Physician Clinics: A Systematic Review. International Journal of Environmental Research and Public Health, 17, 6587.

Vellani, Karim H. (2020). "Impressing Your Boss: Using the IAHSS Foundation's Crime Survey and Other Foundation Research to Improve Your Program." International Association of Healthcare Security and Safety, Virtual Conference, September 1, 2020.

Vellani, Karim H. (2020). "2020 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H. (2019). *Strategic Security Management: A Risk Assessment Guide for Decision Makers*, Second Edition. Boca Raton, FL: Taylor & Francis CRC Press.

Vellani, Karim H. (2019). "Evidence, Anecdotes, and Actions: A Summary of the 2019 Healthcare Crime Survey and other IAHSS Foundation Research." *Journal of Healthcare Protection Management*, Volume 35, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2019). "2019 Healthcare Crime Survey." International Association of Healthcare Security and Safety, Orlando, FL, May 21, 2019.

Vellani, Karim H. (2019). "How Many Security Officers Do You Need? An Evidence-based Approach to Determining the Industry Average Number of Hospital Security Officers." International Association of Healthcare Security and Safety, Orlando, FL, May 20, 2019.

Vellani, Karim H., Michael S. D'Angelo and Ken Wheatley (2019). "Vetting Clients: From First Call Through Final Report." 35th Annual Conference, Miami, FL, International Association of Professional Security Consultants, May 5, 2019.

Vellani, Karim H. (2019). "2019 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H., Robert J. Emery, Sadie H. Conway, and Lisa A. Pompeii (2019). "A Refined Model for Estimating the Industry-Average Number of Security Staff for Hospitals." *Journal of Healthcare Protection Management*, Volume 35, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2018). "Threat Assessment in the Private Sector: Application of the IAPSC Forensic Methodology Threat Assessment Section Outside of Litigation." 34th Annual Conference, San Diego, California, International Association of Professional Security Consultants, April 30, 2018.

Vellani, Karim H. (2017). "Violence Against Healthcare Workers: Persistent Trends and Appropriate Responses." *Journal of Healthcare Protection Management*, Volume 32, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2017). "2017 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H. (2016). "The Battle against Violence in U.S. Hospitals." *Journal of Healthcare Protection Management*, Volume 32, Number 2, International Association for Healthcare Security & Safety.



Vellani, Karim H. (2016). "2016 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H. (2015). "Arming Security Officers" (Panelist). International Association of Healthcare Security and Safety, Houston, Texas, November 13, 2015.

Vellani, Karim H. (2015). "Statistics as a Security Management Tool" in Charles A. Sennewald's Effective Security Management, 6th Edition. Woburn: Elsevier.

Vellani, Karim H. (2015). "Workplace Violence." Greater Houston Industrial Hygiene Council, Houston, TX, June 18, 2015.

Vellani, Karim H. (2015). "Security Risk Assessments." Greater Houston Industrial Hygiene Council, Houston, TX, June 18, 2015.

Vellani, Karim H. (2015). "2015 Healthcare Crime Survey." International Association of Healthcare Security and Safety, St. Louis, MO, May 5, 2015.

Vellani, Karim H. (2015). "2015 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H., Robert J. Emery, and Jennifer M. Reingle Gonzalez (2015). "A Data-Driven Model for Estimating Industry Average Numbers of Hospital Security Staff." Journal of Healthcare Protection Management, Volume 31, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2015). Foreword to Michael S. D'Angelo's From Police to Security Professional: A Guide to a Successful Career Transition. Boca Raton: CRC Press.

Vellani, Karim H. (2014). "Reducing Violence in Healthcare Facilities." International Association of Healthcare Security and Safety, Houston, Texas, July 19, 2014.

Vellani, Karim H. (2014). "2014 Healthcare Crime Survey." International Association of Healthcare Security and Safety, San Diego, CA, May 20, 2014.

Vellani, Karim H. (2014). "2014 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H. (2014). "Reducing Violence in Healthcare Facilities." Journal of Healthcare Protection Management, Volume 30, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2013). "The Business Plan and Successful Security Partnering" Successful Security Consulting Seminar, International Association of Professional Security Consultants and ASIS - International. Chicago, IL, September 23, 2013.

Vellani, Karim H. (2012). "The Need for Effective Consulting Websites" in Charles A. Sennewald's Security Consulting, 4th Edition. Woburn: Elsevier.

Vellani, Karim H. (2012). "Security Staffing: Madness to Methods to Outcomes." International Association of Healthcare Security and Safety, Houston, Texas, October 12, 2012.

Vellani, Karim H., Norman Bates, and Steve Kaufer (2012). "Security 2012 – The Latest Trends in Crime Analysis, Security Technology and Management Practices for Inadequate Security Litigators." National Crime Victim Bar Association, New Orleans, LA, September 21, 2012.

Vellani, Karim H., Robert J. Emery, and Nathan Parker (2012). "Staffing Benchmarks: How Many Security Officers are Enough?" Journal of Healthcare Protection Management, Volume 28, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2011). "Using Crime Analysis to Solve Problems in 15 Small Steps." Journal of Healthcare Protection Management, Volume 27, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2011). "Crime Analysis: A Framework for Optimizing Security." International Association of Healthcare Security and Safety, Toronto, Ontario, May 24, 2011.

Vellani, Karim H. (2011). "Statistics as a Security Management Tool" in Charles A. Sennewald's Effective Security Management, 5th Edition. Woburn: Butterworth-Heinemann.

Vellani, Karim H. with Brian Gouin (2010). "Security Risk Assessments in the Environment of Care." American Society of Healthcare Risk Management, Tampa, FL, October 15, 2010.

Vellani, Karim H. (2010). "The Business Plan and Successful Security Partnering" Successful Security Consulting Seminar, International Association of Professional Security Consultants and ASIS - International. Dallas, TX, October 11, 2010.

Vellani, Karim H. (2010). "Security Risk Assessments." Texas Regional Conference, The Woodlands, Texas, International Association of Professional Security Consultants, September 15, 2010.



Vellani, Karim H. (2010) "Crime Analysis for Problem Solving Security Professionals in 25 Small Steps." Karim H. Vellani. [Center for Problem Oriented Policing www.popcenter.org].

Vellani, Karim H. (2010). "Crime Analysis: Assessing Threats to Optimize Security." Threat Analysis Group, LLC. Available via Amazon.com.

Vellani, Karim H. (2010). "Crime Analysis: Optimizing Security in Healthcare Facilities." International Association of Healthcare Security and Safety, Houston, Texas, May 21, 2010.

Vellani, Karim H. (2010). "Crime Analysis: A Framework for Optimizing Security and Assessing Foreseeability." 26th Annual Conference, Savannah, Georgia, International Association of Professional Security Consultants, April 26, 2010.

Vellani, Karim H. (2009). "Security Risk Assessments." Security 101 for Health and Safety Professionals, Southwest Center for Occupational & Environmental Health, School of Public Health, University of Texas, October 29, 2009.

Vellani, Karim H. (2009). "The Business Plan and Successful Security Partnering" Successful Security Consulting Seminar, International Association of Professional Security Consultants and ASIS - International. Anaheim, CA, September 20, 2009; Dallas, TX, October 11, 2010; Orlando, FL, September 18, 2011.

Vellani, Karim H. (2009). "Security Risk Assessments." Healthcare Security: Basic Industry Guidelines, January 2009, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2008). "Data Driven Security." Security Solutions Series, Threat Analysis Group, LLC.

Vellani, Karim H. (2008). "Risk Assessments in the Environment of Care." Wisconsin Healthcare Engineering Association, October 29, 2008.

Vellani, Karim H. (2008). "The Uniform Crime Reporting System" in Charles A. Sennewald and John H. Christman's Retail Crime, Security, and Loss Prevention: An Encyclopedic Reference. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2008). "Threat Assessment in the Retail Environment" in Charles A. Sennewald and John H. Christman's Retail Crime, Security, and Loss Prevention: An Encyclopedic Reference. Woburn: Butterworth-Heinemann.



Vellani, Karim H. (2007). "Security Risk Assessments." Security 101 for Health and Safety Professionals, Southwest Center for Occupational & Environmental Health, School of Public Health, University of Texas, November 14, 2007.

Vellani, Karim H. and Robert E. Owles (2007). "Vulnerability and Risk Assessments in the Environment of Care." Journal of Healthcare Protection Management, Volume 24, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2007). Foreword to Brian Gouin's Physical Security Consulting. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2007). "The Gentle Art of Threat Assessment." Journal of Healthcare Protection Management, Volume 23, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2006). "Crime Analysis" in John J. Fay's Encyclopedia of Security Management: Techniques and Technology, 2nd Edition. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2006). "Security Risk Assessments in the Environment of Care." International Association of Healthcare Security and Safety, Houston, Texas, May 21, 2010.

Vellani, Karim H. (2006). Strategic Security Management: A Risk Assessment Guide for Decision Makers. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2006). "Strategic Security Management: Risk Assessments in the Environment of Care." Journal of Healthcare Protection Management, Volume 22, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2005). "Certified Security Consultant." Successful Security Consulting Seminar, International Association of Professional Security Consultants. Orlando, FL, September 10, 2005.

Vellani, Karim H. (2005). "Crime and Foreseeability Analysis." The Sentry. American Society for Industrial Security - International: Houston Chapter. June, 2005.

Vellani, Karim H. (2004). "Crime and Foreseeability Analysis." The Independent Security Consultant. International Association of Professional Security Consultants. Fall, 2004.

Vellani, Karim H. and Charles A. Sennewald (2004). Consultants as a Protection Resource, Protection of Assets Manual. Alexandria: ASIS International.

Vellani, Karim H. (2004). "The Business Plan." Successful Security Consulting Seminar, International Association of Professional Security Consultants. Dallas, TX, September 25, 2004; Carefree, AZ, May 7, 2006; San Diego, CA, September 24, 2006.

Vellani, Karim H. (2004). "Writing Effective Proposals" International Association of Professional Security Consultants. Newport Beach, CA, April 27, 2004.

Vellani, Karim H. (2004). "Boosting Performance and Morale." Security Business Practices Reference, Volume 6, ASIS Council on Business Practices, ASIS International.

Vellani, Karim H. (2004). "Achieving Return on Investment from Crime Analysis." Security Business Practices Reference, Volume 6, ASIS Council on Business Practices, ASIS International.

Vellani, Karim H. (2003). "Security Solutions for Strip Shopping Centers." Security Solutions Series, Threat Analysis Group, LLC, 2003.

Vellani, Karim H. (2003). "Security Solutions for Grocery Stores." Security Solutions Series, Threat Analysis Group, LLC, 2003.

Vellani, Karim H. and Mark Batterson (2003). "Security Solutions for Banks." Security Solutions Series, Threat Analysis Group, LLC, 2003.

Vellani, Karim H. (2003). "Statistics as a Security Management Tool" in Charles A. Sennewald's Effective Security Management, 4th Edition. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2002). "Crime Analysis: The First Step in Creating an Effective Crime Prevention Program." Security Business Practices Reference, Volume 5, ASIS Council on Business Practices, ASIS International.

Vellani, Karim H. (2002). "Crime Analysis in the Medical Environment." Workplace Safety Seminar, School of Public Health, University of Texas Health Science Center, December 2, 2002.

Vellani, Karim H. (2002). "Risk Analysis" University of Houston - Downtown. CJ 5360: Security and Crisis Management: Theories and Practices, April 8, 2002.

Vellani, Karim H. (2002). "Crime Analysis Literature: What We Have and Where We Are Going." Forecaster, International Association of Crime Analysts, Spring 2002.

Vellani, Karim H. (2001). "Rape Zones: Are Some Neighborhoods More Prone To Sexual Assault?" KHOU 11, Houston, Texas. Aired November 25, 2001.



Vellani, Karim H. (2001). "Crime Analysis: The First Step in Creating an Effective Crime Prevention Program." 47th Annual Seminar & Exhibit, San Antonio, Texas, American Society for Industrial Security, October 1, 2001.

Vellani, Karim H. (2001). "Don't Let Your Guard Down." Security Management, American Society for Industrial Security, October 2001. Edited extensively by Security Management editors.

Vellani, Karim H. (March 29, 2000). "Convenience Store Security." Presented to Pakistan Association of Greater Houston (PAGH).

Vellani, Karim H. and Joel D. Nahoun (2001). Applied Crime Analysis. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2000). "Security + Service = Satisfaction: The Perks of Private Security." Journal of Property Management, Institute of Real Estate Management, May/June 2000.

Vellani, Karim H. (1999). "Crime Stoppers." Journal of Property Management, Institute of Real Estate Management, September/October 1999.

Vellani, Karim H. (1998). "Management Ideas for Preventing Crime: An Analysis of Liability, Site-Specific Crime Prevention, Crime Prevention Through Environmental Design, and Violence Escalation." Sam Houston State University, Huntsville, Texas.

TESTIMONIAL HISTORY

I testified by deposition or in trial in the following matters during the past four years:

Civil Action File No. 16A 1213-7; Melissa Shadow, Plaintiff vs. FedEx Corporation, FedEx Ground Package System, Inc. Federal Express Corporation, Federal Express Corporate Services, Inc., Threat Assessment Group, Inc., AlliedBarton Security Services, LLC, Estate of Geddy Lee Kramer, and John Doe Nos. 1-5, Defendants; In the State Court of Cobb County, State of Georgia
April 26, 2019

Civil Action File No. 2017-CV-00381; Misty Taylor, Plaintiff vs. Hickory Park, Ltd. d/b/a Hickory Park Apartments, Total Protection Guard Services, LLC, Defendants; In the State Court of Clayton County, State of Georgia
April 30, 2019



Cause No. 17CY-CV04288; Janet Wilson, Plaintiffs vs. Stephon A. Sanders, Esteban Montes, F.I.N.S.S. Associates, L.P. d/b/a Vivion Oak Apartments, N.F.I. Apartment Management LLC, Defendants; In the Circuit Court of Clay County, Missouri at Liberty July 20, 2019

Civil Action File No. 18C04723-1; Michael Smith as Successor Conservator of Desmond Riddle, Jacorion Riddle, Bianca Jordan, Ebonie Riddle and Ashley Riddle, the Surviving Minor Children of Stephanie Riddle, Deceased, Plaintiffs vs. Parks Hotel & Resorts, Inc. f/k/a Hilton Worldwide, Inc. d/b/a Hilton Atlanta Airport and John Does 1-10, Defendants; In the State Court of Gwinnett County, State of Georgia September 19, 2019

Civil Action No. 16A59864; Kendra Mallard, Plaintiff vs. Metropolitan Atlanta Rapid Transit Authority, DeAngelo Jawaun Bryant, and Khary Scipio, Defendants; In the State Court of DeKalb County, State of Georgia October 4, 2019

No. B-196,973; Christian Cane, Plaintiff vs. Amy Investments d/b/a Triangle Market, Defendants; In the District Court of Jefferson County, Texas, 60th Judicial District October 31, 2019

Civil Action File No. 2018CV01532; Dreyson Stadterman, Plaintiff vs. Southwood Realty Company; Walden by Triangle Real Estate, LLC; and Keita Bennett, Defendants; In the State Court of Clayton County, State of Georgia November 26, 2019

Civil Action No. 2018CV01674; Jessica Spears, Plaintiff vs. First Communities Management, Inc., Averly Holdings, LLC, and John Does Nos. 1-5, Defendants; In the State Court of Clayton County, State of Georgia February 13, 2020

Cause No. 2018-CI22280; Aimee Murphy, Individually and as Legal Heir of the Estate of Jonathan Murphy, Deceased, Plaintiff vs. Jason Matthew Prieto, Jose Luis Rojas and Ryan Brockett, Defendants; In the District Court of Bexar County, Texas, 166th Judicial District February 28, 2020

Cause No. 471-00022-2019; Marie Johnson and Joshua Johnson v. American Multi-Cinema, Inc., Stonebriar Mall, LLC. d/b/a Stonebriar Centre, Brookfield Property REIT Inc. f/k/a GGP Real Estate, and Universal Protection Services, LLC d/b/a Allied Universal; In the District Court 471st Judicial District Collin County, Texas April 27, 2020

Civil Action No. 17A66840; Jose Ricardo Marquez and Lazaro Fuentes, Plaintiffs vs. FV Apts LLC, CF Real Estate Services LLC, CF Real Estate Services Manager LLC, CF Property Management LLC, Trantor Property Management, LLC, Trantor Management, Inc., Trantor Realty, LLC, Trantor Realty, Inc., Forest Vale Apartments, and John Does 1-5, Defendants; In the State Court of DeKalb County, State of Georgia
June 9, 2020

No. 2017 L 11405; Karin Carlson and Grant Maddox, Plaintiffs vs. Going Places, LLC; Dearborn Street Building Associates, LLC; PBBS, INC.; PMD Realty, LLC; PMD Builds, LLC, and Astor Street Partners, LLC, Defendants; In the Circuit Court of Cook County, Illinois, County Department - Law Division
December 10, 2020

Civil Action File No. 18EV002664; Rogelio Monroy Mayorga, Plaintiff vs. The Fulton-DeKalb Hospital Authority, Grady Memorial Hospital Corporation, and John Does Nos. 1-5, Defendants; In the State Court of Fulton County, State of Georgia
January 12, 2021

Civil Suite No. 263,393; Ali Kazan and Ebony Medlin, Individually and on Behalf of their Daughter, Lia Kazan, deceased, Plaintiffs vs. Red Lion Hotels Corporation, Red Lion Hotels Franchising, Inc., Vantage Hospitality Group, Inc., Om Ganesh, LLC, Ketan Patel, and Vitthal, LLC, Defendants; In the 9th Judicial District Court, Parish of Rapides, State of Louisiana
June 22, 2021

Civil Action File No. 20A82018; Latwenita Gay, on behalf of the Estate of Antoine Neville, and on behalf of Ariana Stephens, Antonio Neville, Jr., Giovanni Neville, Elijah Jews, Ayden Jews, and Demi Y'lani Perry, the minor children of Antonio Neville, Plaintiffs vs. Shaw Hospitality, LLC d/b/a/ Gulf America Inn a/k/a Gulf American Inns, Quintavus Williams, a/k/a Quintavius Williams, a/k/a Quintavus Fred Williams, a/k/a Quintavius Fred Williams, a/k/a Fred Williams, a/k/a Mario Teasley, Brandisha Williams, and John Does 1-10, Defendants; In the State Court of DeKalb County, State of Georgia
July 28, 2021

Case No. 1:20-Cv-03129-Ca; Mildred Collins-Williams as Administrator of the Estate of Tijuana Frazier and as Guardian and Next Friend of Quanisha Holt, a Minor, and Pebbles McClain as Guardian and Next Friend of Julian Frazier and Isaiah Frazier, Plaintiffs vs. Contour Eastwyck, LLC, Defendant; In the United States District Court for the Northern District of Georgia, Atlanta Division
August 5, 2021

CAFN: 18CV01884JFL003; Sherry K. Watrous and Jay Watrous v. River Root Partners, LLC, and River Root Partners II, LLC, and River Root Investors, LLC, The Kroger Co., R.H. Ledbetter Properties, Inc., RHLP, LLC, dlb/a R.H. Ledbetter Properties, LLC,



Frontline Defense Protection Services, LLC, and John/Jane Does 1-3 Floyd County Superior Court, State of Georgia
August 25, 2021

Civil Action No. 20EV002147; Tynesha Bostick, as next friend and surviving parent of Malik Werts, deceased, and John Doe, as the administrator of the estate of Malik Werts, deceased, Plaintiffs vs. MSC Fields Peachtree Retreat, LL, MSC Investment and Management, LLC, MSC Properties, LLC and John Does # 1-3, Defendants; In the State Court of Fulton County, State of Georgia
September 21, 2021

Cause No. 2019C123891; Ildefonsa Hernandez, Individually and as Next Friend of Sergio Hernandez, Jasmine Hernandez, Danielle Hernandez, Minors, Plaintiff vs. Monica Ray Silva, and Jacob Engelbrecht, and Judith Deramus, and Express Care Ambulance Services, Defendants; In the District Court of the 131st Judicial District, Bexar County, Texas
September 23, 2021

Civil Action No. 20-A-301; Smith, Dawn C. Smith and Brad S., Smith, Plaintiffs vs. Six Flags Over Georgia, LLC, Six Flags Over Georgia, LTD (L.P.), Six Flags Over Georgia II, LP, Six Flags Over Georgia, Inc., Six Flags Fund, LTD, LP, SFOG II, Inc., SFG-I, LLC, SFG-II, LLC, and John Does Nos. 1-5, Defendants; In the State Court of Cobb County, State of Georgia
January 6, 2022

Andrea Chamblee, Personally and as the Personal Representative of the Estate Of John P. McNamara, et al / Beth Rittenour, et al v. The Baltimore Sun Company, LLC, et al / Bestgate Corporate Center, LLC, et al., No's. C-02-CV-21-000820 & C-02-CV-21-000823
January 14, 2022

Civil Action File No. SU20CV0185; Lashanda Callaway, Plaintiff and Justyn Aikens, Plaintiff vs. Clarke Gardens Apartments; Ashton Clarke, LP; Ambling Management Co. LLC; and John Doe Defendants A through H, Defendants; In the Superior Court of Clarke County, State of Georgia
March 29, 2022

Cause No. CC-19-03831-D; Jessica Hill as Next Friend of HVH, SMH, JRH, and KPH, Minor Children, Priscilla Escobedo-Hill, Individually, and as Next Friend of KMH, a Minor and Romeo Hill, Individually, Plaintiffs vs. RCI Hospitality Holdings, Inc., d/b/a XTC Dallas Cabaret, Front-Line Protective Services, Eric Hansen, And Daterrious Haggard, Defendants; In the County Court at Law No. 4 of Dallas County, Texas
March 31, 2022



No. 2017 L 11405; Karin Carlson and Grant Maddox, Plaintiffs vs. Going Places, LLC; Dearborn Street Building Associates, LLC; PBBS, INC.; PMD Realty, LLC; PMD Builds, LLC, and Astor Street Partners, LLC, Defendants; In the Circuit Court of Cook County, Illinois, County Department - Law Division
April 6, 2022 (Trial Testimony)

Civil Action File No. 2020RCCV00531; Aubrey Adams-Knowlden, Plaintiff vs. August Mall, LLC; Amy Dalton; Andy Frain Services, Inc. and John Does 1-20, Defendant(s); In the Superior Court of Richmond County, State of Georgia
June 9, 2022

Case No. 2021-007809-CA-01; Ronald Walker, as Personal Representative of the Estate of Devan Walker, deceased, Plaintiff vs. Pink Pressure, Inc. and Marlin Road Partners, LLC, Defendants; In the Circuit Court of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida, Circuit Court Civil Division
June 29, 2022

Cause No. 2019-43473; Christopher Esquivel and Maria Maya, Individually and as Representatives of the Estate of Ramon Esquivel (Deceased), Plaintiffs vs. KVA Investments, LLC d/b/a Bristol Court Apartments, and Falcon Security, Inc., Defendants; In the 269th District Court, Judicial District Court, Harris County, Texas
July 15, 2022

Case No. 2021-00-3836-CA-01; Barbara Smith, as Personal Representative of the Estate of Gregory Smith, Jr., Plaintiff vs. Providence 72 LLC, the Lopez Companies, Inc., & John Doe, Defendants; In the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, Civil Division
August 29, 2022

Cause No. 2019-04407; Juan Ramos Cantu vs. Village Real Property, Inc.; In the District Court of Harris County, Texas; 80th Judicial District
September 30, 2022

Civil Action No. STCV19-01893; Tonya Sills, Plaintiff vs. New Millennium Smiles, LLC d/b/a Savannah Smiles Dueling Pianos, Defendant; In the State Court of Chatham County, State of Georgia
November 14, 2022

Case No. 21-018455; Shanika Williams, Plaintiff vs. Venice Partners, LTD., a Florida Corporation, Southport Financial Services, Inc., a Foreign Corporation, and Cambridge Management of Washington, Inc. a Foreign Corporation, Defendants; In the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida
November 16, 2022



Caroline Bradley, Plaintiff vs. Golden Pantry Food Stores, Inc., Eric Mitchell, and John Does 1 and 2, Defendants; In the State Court of Clarke County, State of Georgia
December 1, 2022

Case No. A-20-812202-C, Dept. No. IV; Glenn Bension, Administrator of the Estate of Jamie Arnold, Deceased; and Shirley Arnold, and Heir to the Estate of Jamie Arnold, Deceased, Plaintiffs vs. Alhambra Place Partnership, LP, Advanced Management Group Nevada, LLC, Reliance Security, Inc., Defendants; In the District Court, Clark County, Nevada
December 5, 2022

Cause No. 2021-23853; Ricci Simmons, Jr., Plaintiff vs. Crysnick Entertainment, LLC d/b/a Bar 2200, Boniuk Interests, Ltd., Mila Properties, Inc., Crystal D. Henderson, and G4S Secure Solutions (USA), Inc., Defendants; In the District Court, Harris County, Texas, 281st Judicial District
December 14, 2022

Cause No. 2021-37331; Reta L. Hutchins, Individually and as Estate Representative for Decedent, Marquise Hutchins, and Traivion Moore, Plaintiffs vs. 7-Eleven Inc., ANR Corporation, Defendants; In the District Court, Harris County, Texas, 11th Judicial District
March 2, 2023

COMPENSATION

My time is billed at \$500 per hour. To date, I have billed \$8,300 in fees and expenses.

--- End of Report ---

This report may be supplemented as additional discovery is made available and other case activity is completed.

APPENDIX A: Curriculum Vitae of Karim Vellani

Professional Experience Summary

Karim H. Vellani is the President of Threat Analysis Group, LLC, an independent security consulting firm. Karim is Board Certified in Security Management (CPP), a Board-Certified Security Consultant (CSC), and has over 28 years of security management, crime analysis, and forensic security consulting experience. He has a bachelor's degree in Criminal Justice with a specialization in Law Enforcement and a master's degree in Criminal Justice Management. He is the author of three books, Applied Crime Analysis, Strategic Security Management, Unraveled: An Evidence-Based Approach to Understanding and Preventing Crime, and has contributed to a number of other security related books and journals. Karim serves on various research teams conducting evidence-based research on violent crime prevention, workplace violence, sex trafficking, and use of force.

As an independent security management consultant, Karim has been retained by Fortune 500 companies and government agencies. He has extensive experience in risk management and security force protection and provides consultation on a regular basis at government, commercial, and residential facilities across the nation. Karim has worked on projects ranging from data centers, hospitals and healthcare facilities, houses of worship, manufacturing facilities, financial institutions, retailer stores, shopping centers and malls, hotels and motels, office buildings, and residential housing (including Section 8).

For 11 years, Karim was responsible for managing the quality control/assurance function for United States Department of Homeland Security's (DHS) protection force at federal government buildings in 23 states including Mississippi, Alabama, West Virginia, California, Montana, North Dakota, South Dakota, Wyoming, Utah, Nevada, North Carolina, Tennessee, Arizona, Kentucky, Illinois, Washington, Idaho, Texas, Oklahoma, Florida, South Carolina, Rhode Island, and Massachusetts.

Karim specializes in crime analysis and security risk assessment and mitigation. He developed a crime analysis methodology that utilizes the Federal Bureau of Investigation's (FBI) Uniform Crime Report coding system and a proprietary software application called CrimeAnalysis™. The software allows end users to identify specific threats, select appropriate countermeasures, and reduce their risk. The methodology was originally published in Applied Crime Analysis and evolved in Unraveled: An Evidence-Based Approach to Understanding and Preventing Crime. Since developing the crime analysis methodology, Karim has assessed crime threats at thousands of facilities. Karim has also developed a Security Risk Assessment Methodology for Healthcare Facilities and Hospitals. In 2009, the International Association of Healthcare Security and Safety (IAHSS) published its *Security Risk Assessment* Guideline, which was authored by Karim at the request of IAHSS. He was also a Technical Committee Member on the Risk Assessment Standard Development Committee for the American Society for Industrial Security - International (ASIS).



Karim also provides forensic security consulting services to insurance companies and the legal profession. In this work, Karim provides litigation support to attorney's and serves as an expert witness in security related lawsuits. As an Adjunct Professor at the University of Houston - Downtown, Karim taught graduate courses in Security Management and Risk Analysis for the College of Criminal Justice's Security Management Program. He has also trained Police and Security Officers in weapons and use of deadly force and profiling and assisted in the development of maritime security training curriculum compliant with ISPS Code and the United States Coast Guard under the Maritime Transportation Security Act. Karim instructs frequently for the International Association of Professional Security Consultants and ASIS-International.

Karim is a member of the International Association of Professional Security Consultants (IAPSC), ASIS-International, the American Society of Criminology (ASC), American Society of Evidence-Based Policing (ASEBP), the International Association of Crime Analysts (IACA), the International Association of Chiefs of Police (IACP), and the International Association for Healthcare Security & Safety (IAHSS). In the past, Karim served as President of the IAPSC, Director for the IAHSS Foundation and Chair of the Evidence-Based Research Committee. Currently, Karim serves on the IAPSC Forensic Committee and chairs the IAPSC's Evidence-Based Security Practices Committee.

Current Employment

Threat Analysis Group, LLC

President & Independent Security Consultant

- Provide project management services for security deployment, training, engineering and design, and assessments
- Provide security management consulting services including risk assessment methodology development and execution, threat assessments and crime analysis, vulnerability assessments and security surveys
- Provide forensic security consulting
- Develop and maintain CrimeAnalysis™ services and software to determine threat level at client facilities

Past Employment

University of Houston – Downtown

Adjunct Professor



- Taught graduate courses in Security Management and Risk Analysis for the Security Management Master's Program at the University's College of Criminal Justice.

Texas One Security

Operations Manager

- Managed over one hundred security officers and approximately 1400 guard hours at seventeen (17) client sites
- Responsibilities included hiring and training, deployment and scheduling, and conducting performance evaluations for the company's security force
- Ensured that the officer's and the company complied with Texas Private Security Bureau rules and regulations.

Operational Support Services, Inc.

Law Enforcement Advisor/Security Consultant

- Provided security consulting services to police departments, private security companies, insurance companies, federal and state government agencies, and the legal profession
- Responsibilities included analyzing client's risk by conducting threat and vulnerability assessments

North Harris College

Instructor

- Trained Police and Security Officers in firearms use
- Trained Security Officers on laws, including deadly force and profiling

Roehling Corporate International Investigations, Inc.

Private Investigator

- Provided investigative services to the legal profession, insurance companies, and private corporations
- Served on search team for Oklahoma escaped convict Randolph Franklin Dial

Certifications & Licenses

Board Certified Security Consultant (CSC)



International Association of Professional Security Consultants (IAPSC)

Board Certified in Security Management (CPP)

American Society for Industrial Security - International (ASIS)

Board Certified Protection Officer (CPO)

International Foundation for Protection Officers

Board Certified Police Firearms Instructor

National Rifle Association of America

Education & Training

Bachelor of Science, Criminal Justice (Specialization in Law Enforcement), Sam Houston State University, August 1994

Master of Science, Criminal Justice Management, Sam Houston State University, August 1998

Instructors Course, Texas Commission on Law Enforcement Standards and Education

Certified Protection Officer Course, International Foundation for Protection Officers

Certified Protection Professional Course, American Society for Industrial Security – International

Concealed Handgun Instructor Course, Texas Department of Public Safety

Gang Crimes, Montgomery County Sheriff's Department

Level One Training, Texas Private Security Bureau

Personal Protection and Home Safety Instructor Course, National Rifle Association of America

Pistol, Rifle and Shotgun Instructor Course, National Rifle Association of America

Police Firearms Instructor Course, National Rifle Association of America

Identifying and Managing Risky Facilities, International Association of Professional Security Consultants

An Analyst's Role in a Homicide Investigation, International Association of Crime Analysts



Identifying Crime and Crash Patterns, Analyst Mastermind Series, International Association of Directors of Law Enforcement

Criminal Profiling in Crime Analysis, International Association of Crime Analysts

Professional Affiliations

American Society of Criminology (ASC)

American Society of Evidence-Based Policing (ASEBP)

American Society for Industrial Security - International (ASIS)

International Association of Chiefs of Police (IACP)

International Association of Crime Analysts (IACA)

International Association for Healthcare Security & Safety (IAHSS)

International Association of Professional Security Consultants (IAPSC)

Accomplishments

Chair, Evidence-Based Security Practices Committee, 2022 - Present
International Association of Professional Security Consultants (IAPSC)

Member, Forensic Security Committee, 2004 – Present
International Association of Professional Security Consultants (IAPSC)

Chair, Evidence Based Research Committee, 2015 - 2020
International Association of Healthcare Security and Safety Foundation

Member, Board of Directors, 2013 – 2020
International Healthcare Security and Safety Foundation

Member, Use of Force Best Practice Committee, 2019 – 2020
International Association of Professional Security Consultants (IAPSC)

Technical Committee Member, Enterprise Security Risk Management (ESRM) Guideline, 2019 - 2020
American Society for Industrial Security - International (ASIS)



Technical Committee Member, Private Security Officer Selection and Training Guideline, 2017 - 2018

American Society for Industrial Security - International (ASIS)

Member, Security Metrics/Data Task Force, 2016-2019

International Association of Healthcare Security and Safety

Technical Committee Member, Private Security Officer (ANSI Standard), 2015 - 2017

American Society for Industrial Security - International (ASIS)

Member, Board of Directors, 2011 - 2015

International Association of Professional Security Consultants (IAPSC)

Technical Committee Member, Risk Assessment (ANSI Standard), 2013 - 2016

American Society for Industrial Security - International (ASIS)

Chairman, Council on Advocacy, 2011 - 2012

International Association for Healthcare Security & Safety (IAHSS)

Advisory Member, Security Lighting for People, Property, and Critical Infrastructure Guideline (G-1-16), 2011 – 2017

Illuminating Engineering Society of North America (IESNA)

Technical Committee Member, Private Security Company (ANSI Standard), 2012 - 2013

Maturity Model for the Phased Implementation of a Quality Assurance Management System for Private Security Service Providers (PSC.3) Standard

American Society for Industrial Security - International (ASIS)

Technical Committee Member, Private Security Company (ANSI Standard), 2011 - 2012

Conformity Assessment and Auditing Management System for Quality of Private Security Company Operations (PSC.2) Standard

American Society for Industrial Security - International (ASIS)

Technical Committee Member, Private Security Company (ANSI Standard), 2011 – 2012

Management System for Quality of Private Security Company Operations (PSC.1)

American Society for Industrial Security - International (ASIS)

Technical Committee Member, Physical Asset Protection (ANSI Standard), 2011 - 2012

American Society for Industrial Security - International (ASIS)

Immediate Past President, 2009 - 2011



International Association of Professional Security Consultants (IAPSC)

President, 2008 - 2009

International Association of Professional Security Consultants (IAPSC)

Vice President, 2007 - 2008

International Association of Professional Security Consultants (IAPSC)

Secretary, 2006 - 2007

International Association of Professional Security Consultants (IAPSC)

Member, Board of Directors, 2004 - 2006

International Association of Professional Security Consultants (IAPSC)

Chairman, Professional Certification Committee, 2004 - 2006

International Association of Professional Security Consultants (IAPSC)

Member, Private Security Services Council, 2005 – 2006

American Society for Industrial Security - International (ASIS)

Chairman, Certifications Committee, 2004 - 2006

American Society for Industrial Security - International (ASIS) - Houston Chapter

Chairman, By-Laws Committee, 2004

International Association of Professional Security Consultants (IAPSC)

Chairman, Certified Protection Professional Committee, 2002 - 2003

American Society for Industrial Security - International (ASIS) - Houston Chapter

Committee Member, Publications Committee, 2001 - 2002

International Association of Crime Analysts (IACA)

Publications & Presentations

Vellani, Karim H. (2023). "Using Evidence-Based Research to Understand and Prevent Crime." Evidence-Based Security Practices Committee, International Association of Professional Security Consultants, January 24, 2023.

Army, Christine, & Vellani, Karim H. (2023). Risky Behaviors and Violent Victimization (EBSP-23-01). Evidence-Based Security Practices, International Association of Professional Security Consultants.



Vellani, Karim H. (2022). "Using Evidence-Based Research to Understand and Prevent Crime." 37th Annual Conference, International Association of Professional Security Consultants, Denver, CO, June 14, 2022.

Vellani, Karim H. (2022). "Assessing Crime Risk." Fundamentals in Forensic Security Consulting, International Association of Professional Security Consultants, Denver, CO, June 13, 2022.

Vellani, Karim H., & Kristof, Tina S. (2022). "Security's Critical Role In Combating Sex Trafficking." Journal of Healthcare Protection Management, Volume 76, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2021). Unraveled: An Evidence-Based Approach to Understanding and Preventing Crime. Sugar Land, TX: Threat Analysis Group, LLC.

Vellani, Karim H. (2021). "Mitigating Security Risks with Evidence-Based Research." Hospital Association of Southern California, November 3, 2021.

Army, Christine, & Vellani, Karim H. (2021). Violent Crime Typology and Continuum. CrimRxiv. <https://doi.org/10.21428/cb6ab371.71ec923d>

Vellani, Karim H., & Kristof, Tina S. (2021). Identifying and Responding to Sex Trafficking Victims in Healthcare Environments. CrimRxiv. <https://doi.org/10.21428/cb6ab371.84ddfc71>

Vellani, Karim H. and Tina S. Kristof (2021). "Results of the 2020 Healthcare Crime Survey." Journal of Healthcare Protection Management, Volume 36, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H.; Bryan Warren; Jeff Young (2020). "The Impact of COVID-19 on Healthcare Facilities." International Association of Healthcare Security and Safety, October 28, 2020.

Pompeii, Lisa, Elisa Benavides, Oana Pop, Yuliana Rojas, Robert Emery, George Delclos, Christine Markham, Abiodun Oluyomi, Karim Vellani, Ned Levine (2020). Workplace Violence in Outpatient Physician Clinics: A Systematic Review. International Journal of Environmental Research and Public Health, 17, 6587.

Vellani, Karim H. (2020). "Impressing Your Boss: Using the IAHS Foundation's Crime Survey and Other Foundation Research to Improve Your Program." International Association of Healthcare Security and Safety, Virtual Conference, September 1, 2020.

Vellani, Karim H. (2020). "2020 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H. (2019). Strategic Security Management: A Risk Assessment Guide for Decision Makers, Second Edition. Boca Raton, FL: Taylor & Francis CRC Press.

Vellani, Karim H. (2019). "Evidence, Anecdotes, and Actions: A Summary of the 2019 Healthcare Crime Survey and other IAHS Foundation Research." Journal of Healthcare Protection Management, Volume 35, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2019). "2019 Healthcare Crime Survey." International Association of Healthcare Security and Safety, Orlando, FL, May 21, 2019.

Vellani, Karim H. (2019). "How Many Security Officers Do You Need? An Evidence-based Approach to Determining the Industry Average Number of Hospital Security Officers." International Association of Healthcare Security and Safety, Orlando, FL, May 20, 2019.

Vellani, Karim H., Michael S. D'Angelo and Ken Wheatley (2019). "Vetting Clients: From First Call Through Final Report." 35th Annual Conference, Miami, FL, International Association of Professional Security Consultants, May 5, 2019.

Vellani, Karim H. (2019). "2019 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H., Robert J. Emery, Sadie H. Conway, and Lisa A. Pompeii (2019). "A Refined Model for Estimating the Industry-Average Number of Security Staff for Hospitals." Journal of Healthcare Protection Management, Volume 35, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2018). "Threat Assessment in the Private Sector: Application of the IAPSC Forensic Methodology Threat Assessment Section Outside of Litigation." 34th Annual Conference, San Diego, California, International Association of Professional Security Consultants, April 30, 2018.

Vellani, Karim H. (2017). "Violence Against Healthcare Workers: Persistent Trends and Appropriate Responses." Journal of Healthcare Protection Management, Volume 32, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2017). "2017 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H. (2016). "The Battle against Violence in U.S. Hospitals." *Journal of Healthcare Protection Management*, Volume 32, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2016). "2016 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H. (2015). "Arming Security Officers" (Panelist). International Association of Healthcare Security and Safety, Houston, Texas, November 13, 2015.

Vellani, Karim H. (2015). "Statistics as a Security Management Tool" in Charles A. Sennewald's *Effective Security Management*, 6th Edition. Woburn: Elsevier.

Vellani, Karim H. (2015). "Workplace Violence." Greater Houston Industrial Hygiene Council, Houston, TX, June 18, 2015.

Vellani, Karim H. (2015). "Security Risk Assessments." Greater Houston Industrial Hygiene Council, Houston, TX, June 18, 2015.

Vellani, Karim H. (2015). "2015 Healthcare Crime Survey." International Association of Healthcare Security and Safety, St. Louis, MO, May 5, 2015.

Vellani, Karim H. (2015). "2015 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.

Vellani, Karim H., Robert J. Emery, and Jennifer M. Reingle Gonzalez (2015). "A Data-Driven Model for Estimating Industry Average Numbers of Hospital Security Staff." *Journal of Healthcare Protection Management*, Volume 31, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2015). Foreword to Michael S. D'Angelo's *From Police to Security Professional: A Guide to a Successful Career Transition*. Boca Raton: CRC Press.

Vellani, Karim H. (2014). "Reducing Violence in Healthcare Facilities." International Association of Healthcare Security and Safety, Houston, Texas, July 19, 2014.

Vellani, Karim H. (2014). "2014 Healthcare Crime Survey." International Association of Healthcare Security and Safety, San Diego, CA, May 20, 2014.

Vellani, Karim H. (2014). "2014 Healthcare Crime Survey." International Healthcare Security and Safety Foundation.



Vellani, Karim H. (2014). "Reducing Violence in Healthcare Facilities." Journal of Healthcare Protection Management, Volume 30, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2013). "The Business Plan and Successful Security Partnering" Successful Security Consulting Seminar, International Association of Professional Security Consultants and ASIS - International. Chicago, IL, September 23, 2013.

Vellani, Karim H. (2012). "The Need for Effective Consulting Websites" in Charles A. Sennewald's Security Consulting, 4th Edition. Woburn: Elsevier.

Vellani, Karim H. (2012). "Security Staffing: Madness to Methods to Outcomes." International Association of Healthcare Security and Safety, Houston, Texas, October 12, 2012.

Vellani, Karim H., Norman Bates, and Steve Kaufer (2012). "Security 2012 – The Latest Trends in Crime Analysis, Security Technology and Management Practices for Inadequate Security Litigators." National Crime Victim Bar Association, New Orleans, LA, September 21, 2012.

Vellani, Karim H., Robert J. Emery, and Nathan Parker (2012). "Staffing Benchmarks: How Many Security Officers are Enough?" Journal of Healthcare Protection Management, Volume 28, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2011). "Using Crime Analysis to Solve Problems in 15 Small Steps." Journal of Healthcare Protection Management, Volume 27, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2011). "Crime Analysis: A Framework for Optimizing Security." International Association of Healthcare Security and Safety, Toronto, Ontario, May 24, 2011.

Vellani, Karim H. (2011). "Statistics as a Security Management Tool" in Charles A. Sennewald's Effective Security Management, 5th Edition. Woburn: Butterworth-Heinemann.

Vellani, Karim H. with Brian Gouin (2010). "Security Risk Assessments in the Environment of Care." American Society of Healthcare Risk Management, Tampa, FL, October 15, 2010.

Vellani, Karim H. (2010). "The Business Plan and Successful Security Partnering" Successful Security Consulting Seminar, International Association of Professional Security Consultants and ASIS - International. Dallas, TX, October 11, 2010.

Vellani, Karim H. (2010). "Security Risk Assessments." Texas Regional Conference, The Woodlands, Texas, International Association of Professional Security Consultants, September 15, 2010.

Vellani, Karim H. (2010) "Crime Analysis for Problem Solving Security Professionals in 25 Small Steps." Karim H. Vellani. [Center for Problem Oriented Policing www.popcenter.org].

Vellani, Karim H. (2010). "Crime Analysis: Assessing Threats to Optimize Security." Threat Analysis Group, LLC. Available via Amazon.com.

Vellani, Karim H. (2010). "Crime Analysis: Optimizing Security in Healthcare Facilities." International Association of Healthcare Security and Safety, Houston, Texas, May 21, 2010.

Vellani, Karim H. (2010). "Crime Analysis: A Framework for Optimizing Security and Assessing Foreseeability." 26th Annual Conference, Savannah, Georgia, International Association of Professional Security Consultants, April 26, 2010.

Vellani, Karim H. (2009). "Security Risk Assessments." Security 101 for Health and Safety Professionals, Southwest Center for Occupational & Environmental Health, School of Public Health, University of Texas, October 29, 2009.

Vellani, Karim H. (2009). "The Business Plan and Successful Security Partnering" Successful Security Consulting Seminar, International Association of Professional Security Consultants and ASIS - International. Anaheim, CA, September 20, 2009; Dallas, TX, October 11, 2010; Orlando, FL, September 18, 2011.

Vellani, Karim H. (2009). "Security Risk Assessments." Healthcare Security: Basic Industry Guidelines, January 2009, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2008). "Data Driven Security." Security Solutions Series, Threat Analysis Group, LLC.

Vellani, Karim H. (2008). "Risk Assessments in the Environment of Care." Wisconsin Healthcare Engineering Association, October 29, 2008.

Vellani, Karim H. (2008). "The Uniform Crime Reporting System" in Charles A. Sennewald and John H. Christman's Retail Crime, Security, and Loss Prevention: An Encyclopedic Reference. Woburn: Butterworth-Heinemann.



Vellani, Karim H. (2008). "Threat Assessment in the Retail Environment" in Charles A. Sennewald and John H. Christman's Retail Crime, Security, and Loss Prevention: An Encyclopedic Reference. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2007). "Security Risk Assessments." Security 101 for Health and Safety Professionals, Southwest Center for Occupational & Environmental Health, School of Public Health, University of Texas, November 14, 2007.

Vellani, Karim H. and Robert E. Owles (2007). "Vulnerability and Risk Assessments in the Environment of Care." Journal of Healthcare Protection Management, Volume 24, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2007). Foreword to Brian Gouin's Physical Security Consulting. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2007). "The Gentle Art of Threat Assessment." Journal of Healthcare Protection Management, Volume 23, Number 1, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2006). "Crime Analysis" in John J. Fay's Encyclopedia of Security Management: Techniques and Technology, 2nd Edition. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2006). "Security Risk Assessments in the Environment of Care." International Association of Healthcare Security and Safety, Houston, Texas, May 21, 2010.

Vellani, Karim H. (2006). Strategic Security Management: A Risk Assessment Guide for Decision Makers. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2006). "Strategic Security Management: Risk Assessments in the Environment of Care." Journal of Healthcare Protection Management, Volume 22, Number 2, International Association for Healthcare Security & Safety.

Vellani, Karim H. (2005). "Certified Security Consultant." Successful Security Consulting Seminar, International Association of Professional Security Consultants. Orlando, FL, September 10, 2005.

Vellani, Karim H. (2005). "Crime and Foreseeability Analysis." The Sentry. American Society for Industrial Security - International: Houston Chapter. June, 2005.

Vellani, Karim H. (2004). "Crime and Foreseeability Analysis." The Independent Security Consultant. International Association of Professional Security Consultants. Fall, 2004.

Vellani, Karim H. and Charles A. Sennewald (2004). Consultants as a Protection Resource, Protection of Assets Manual. Alexandria: ASIS International.

Vellani, Karim H. (2004). "The Business Plan." Successful Security Consulting Seminar, International Association of Professional Security Consultants. Dallas, TX, September 25, 2004; Carefree, AZ, May 7, 2006; San Diego, CA, September 24, 2006.

Vellani, Karim H. (2004). "Writing Effective Proposals" International Association of Professional Security Consultants. Newport Beach, CA, April 27, 2004.

Vellani, Karim H. (2004). "Boosting Performance and Morale." Security Business Practices Reference, Volume 6, ASIS Council on Business Practices, ASIS International.

Vellani, Karim H. (2004). "Achieving Return on Investment from Crime Analysis." Security Business Practices Reference, Volume 6, ASIS Council on Business Practices, ASIS International.

Vellani, Karim H. (2003). "Security Solutions for Strip Shopping Centers." Security Solutions Series, Threat Analysis Group, LLC, 2003.

Vellani, Karim H. (2003). "Security Solutions for Grocery Stores." Security Solutions Series, Threat Analysis Group, LLC, 2003.

Vellani, Karim H. and Mark Batterson (2003). "Security Solutions for Banks." Security Solutions Series, Threat Analysis Group, LLC, 2003.

Vellani, Karim H. (2003). "Statistics as a Security Management Tool" in Charles A. Sennewald's Effective Security Management, 4th Edition. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2002). "Crime Analysis: The First Step in Creating an Effective Crime Prevention Program." Security Business Practices Reference, Volume 5, ASIS Council on Business Practices, ASIS International.

Vellani, Karim H. (2002). "Crime Analysis in the Medical Environment." Workplace Safety Seminar, School of Public Health, University of Texas Health Science Center, December 2, 2002.

Vellani, Karim H. (2002). "Risk Analysis" University of Houston - Downtown. CJ 5360: Security and Crisis Management: Theories and Practices, April 8, 2002.

Vellani, Karim H. (2002). "Crime Analysis Literature: What We Have and Where We Are Going." Forecaster, International Association of Crime Analysts, Spring 2002.

Vellani, Karim H. (2001). "Rape Zones: Are Some Neighborhoods More Prone To Sexual Assault?" KHOU 11, Houston, Texas. Aired November 25, 2001.

Vellani, Karim H. (2001). "Crime Analysis: The First Step in Creating an Effective Crime Prevention Program." 47th Annual Seminar & Exhibit, San Antonio, Texas, American Society for Industrial Security, October 1, 2001.

Vellani, Karim H. (2001). "Don't Let Your Guard Down." Security Management, American Society for Industrial Security, October 2001. Edited extensively by Security Management editors.

Vellani, Karim H. (March 29, 2000). "Convenience Store Security." Presented to Pakistan Association of Greater Houston (PAGH).

Vellani, Karim H. and Joel D. Nahoun (2001). Applied Crime Analysis. Woburn: Butterworth-Heinemann.

Vellani, Karim H. (2000). "Security + Service = Satisfaction: The Perks of Private Security." Journal of Property Management, Institute of Real Estate Management, May/June 2000.

Vellani, Karim H. (1999). "Crime Stoppers." Journal of Property Management, Institute of Real Estate Management, September/October 1999.

Vellani, Karim H. (1998). "Management Ideas for Preventing Crime: An Analysis of Liability, Site-Specific Crime Prevention, Crime Prevention Through Environmental Design, and Violence Escalation." Sam Houston State University, Huntsville, Texas.

APPENDIX B: Forensic Methodology





Best Practices

FORENSIC METHODOLOGY

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The International Association of Professional Security Consultants has issued this consensus-based and peer-reviewed Best Practice for the guidance of and voluntary use by businesses and individuals who deal or may deal with the issues addressed in the context of third-party premises security litigation, and other security-related cases where the methodology would be helpful.

POSITION STATEMENT

The International Association of Professional Security Consultants does hereby recognize that its members will be called upon to perform as “Forensic Consultants” and serve as Expert Witnesses in a court of law or other legal proceeding. The purpose of these guidelines is to meet the need for a standardized methodology used in the evaluation of premises security cases.

It is recognized that the task of the Forensic Consultant is one of education. Forensic Consultants will provide their opinion(s) to the client, to opposing counsel during deposition, in response to written interrogatories, in reports, and to the judge and jury at trial or any other lawfully convened hearing. This is done with the goal of making others aware of the security issues and contributing to a just and proper conclusion on the litigation.

The responsibility of the Forensic Consultant lies within our system of justice and the ethics of the security profession. The opinions so offered are made as an objective expert witness/consultant, without any financial or other interest in the outcome of the litigation.

Forensic Consultants will, at all times, be forthright, honest, and precise in evolving the ultimate conclusion(s) and opinion(s). The opinion(s) will be the result of a review of all available, applicable documentation and discovery material presented by all parties to the litigation. Site inspections and analytical procedures generally followed by the Forensic Consultant are described in these guidelines.

The following methodology is to be used in atypical premises security case, including crimes committed by employees; workplace violence; negligent hiring, supervision and retention; negligent training; use of force; invasion of privacy; wrongful arrest and/or imprisonment; wrongful prosecution; and other security-related cases.

The Forensic Consultant is expected to exercise diligence in requesting and/or obtaining information that the Consultant reasonably believes is relevant to the facts and circumstances of the case.

It is reasonable to expect variations of the steps, with some steps deleted and others added as the facts and circumstances of the case being analyzed warrant.

EVIDENCE REVIEW— THE PROCESS

In the context of this Guideline, the Forensic Consultant will review and analyze various information, whether produced during the discovery process of the litigation or otherwise obtained through research, common knowledge, investigation, and/or the consultant/expert's experience which allows the Consultant to identify factors leading to an understanding of the crime risks present at the time of the criminal event.

Types of evidence generally available to the Forensic Consultant may include, if relevant, to the following:

1. Complaint/Petition and Pleadings
2. Police Report of the subject incident
3. Site and Immediate Vicinity Crime History, including police and security incident reports
4. Interrogatories and Responses
5. Requests for Production of Documents and Responses, discovery motions
6. Requests for Admissions and Responses
7. Affidavits, Witness Statements, and Interviews
8. Depositions with exhibits
9. Expert Witness Reports and depositions
10. Applicable Medical Records Relating to the Facts of the Incident
11. Photographs, Video and Audio Recordings, etc.
12. Other Related Evidence (e.g., prosecutors file, if available, criminal trial transcript, employee HR files, etc.)
13. Site Plans

14. Applicable standards, codes, and regulations
15. Publications related to the standard of care
16. Lighting plans/diagrams
17. Relevant policies and procedures
18. Security staffing, plans, manuals, post orders and schedules
19. Security services contracts in effect on date of loss
20. Agreements with other security service providers (e.g., off-duty police officers)
21. Background search results of employees/workers

RISK ASSESSMENT

A risk assessment is the general process of identifying relevant risks, given the facts of the case. It is a qualitative, quantitative, or hybrid assessment that seeks to determine the likelihood that criminals could successfully exploit a vulnerability or compromise a security countermeasure.

There are two main components to a risk assessment: a threat assessment and a vulnerability assessment. The threat assessment is an evaluation of the various sources for crime threats. The vulnerability assessment includes an evaluation of the physical aspects of the facility and an analysis of the overall security program as it relates to the specific facts of the case.

The security survey, along with documented evidence, is the means by which security measures utilized and/or available at the facility at the time of the incident that is the subject of the litigation are identified and analyzed.

A risk assessment provides the foundation for effectively determining the adequacy of countermeasures employed.

THREAT ASSESSMENT

A threat assessment is an evaluation of events that can adversely affect operations and/or specific assets. Historical information is a primary source for threat assessments, including past criminal and terrorist events. A threat assessment considers actual and inherent threats.

1. Actual Threats - The crime history at the subject property based on data reflecting actual crime data.¹ Actual threats are a quantitative element of a threat assessment. When assessing actual threats, the following may be considered *as deemed relevant by the security expert*:
 - a. Relevant crimes on the subject property for a three to five-year period prior to the date of the incident.
 - b. Relevant crimes in the immediate vicinity of the subject property for a three to five-year period prior to the date of the incident. [Note: There is no single definition of what constitutes an “immediate vicinity” or “neighborhood” around a given property. Often what is available for evaluation from a law enforcement agency depends upon that agency’s software programming and/or staff capabilities (e.g., the agency can only provide data for a set size of an area, such as a quarter mile radius).]²
 - c. The expert may consider the relationship between offenders and victims (e.g. interpersonal, domestic, targeted, etc.).

2. Inherent Threats –The crime risk at the subject property as determined by the expert based on the property’s characteristics, the expert’s research and/or experience in similar environments, information gathered through the discovery process, and/or a site inspection (if conducted).

VULNERABILITY ASSESSMENT/ SECURITY SURVEY

The vulnerability assessment is an analysis of security weaknesses and opportunities for criminal activity. A security survey is a method for collecting information used in the vulnerability assessment.

A security survey may include a physical survey of the scene of the incident and areas/functions that are applicable to the incident to achieve an understanding of information that has potential application to the matter in litigation.

The following areas of review are not meant to be all inclusive, nor all exclusive. The decision to review the material is at the judgment/discretion of the expert.

1. Incident Review
 - a. Police incident and investigation report(s)
 - b. Security incident report(s)
 - c. Medical records (emergency room and/or autopsy as it relates to information about the occurrence of the incident)
 - d. Other sources of information about how the incident occurred (e.g., witness statements testimony, etc.)

¹ Depending on the police jurisdiction that serves the subject property, different types of crime records may be available. The most common type of crime record used in a crime risk analysis is Calls for Service or dispatch logs. It is important to note that Calls for Service or dispatch log accuracy varies by jurisdiction. Further, changes to incident management and dispatch systems may also impact accuracy even within the same jurisdiction. When assessing relevant crimes, Calls for Service and dispatch logs should not be used alone. Offense/Incident Reports are necessary to validate the Calls for Service or dispatch logs, specifically the crime type, crime location, and whether a crime actually occurred. Calls for service or dispatch logs alone, in many jurisdictions, are insufficient for these three elements.

² The IAPSC recognizes that criminology studies and related research have generally found that crime in the area may not be relevant to the subject property.

2. Site Inspection - Inspect site where the incident occurred and the surrounding area, if relevant. *(Note: Not all cases will require site inspections, nor is it always possible to conduct site views—e.g., if the site has been altered substantially or no longer exists.) Further, the facts of some cases and potential liability issues are not related to the site/property layout, design, or other physical attributes. As such, a site inspection may be unnecessary.*
 - a. Determine layout of the premises
 - b. Evaluate relevant factors (lighting, lines of sight, places of concealment, remoteness, accessibility, security measures, conditions, etc.)
 - c. Review relevant documentation (lease, contract, diagram, map, etc.)
 - d. Assess the characteristics of the surrounding area and what impact, if any, those characteristics may have had on the subject property
3. Security Personnel
 - a. Review security officer(s) (including off-duty law enforcement officers) actions, staffing levels, post orders, duty hours, equipment provided, tours, evaluations, training, hiring procedures and supervision
 - b. Review law enforcement presence and actions (e.g., on-duty, police details, etc.)
 - c. Review roles and actions of non-security related persons who may have participated in the security program and/or incident
 - d. Assess the qualifications and performance of owner/management personnel overseeing the security program
4. Security Management Program
 - a. Review management and security related policies, procedures, and practices
 - b. Review any risk assessments performed prior to the date of the incident
 - c. Review daily activity reports, job descriptions, incident reports and internal correspondence
 - d. Review security services contract
 - e. Review training manuals and materials
 - f. Review depositions regarding employees' understanding of their duties, and all customs and undocumented practices
 - g. Evaluate the qualifications, training, and experience of security management and supervisory personnel
5. Security Equipment
 - a. Review building design and site plans
 - b. Inspect all security devices related to the incident
 - c. Inspect structural security features related to the incident
 - d. Determine the position, function and maintenance status of the relevant security equipment and features in place at the time of the incident
 - e. Determine levels of illumination, if relevant

ANALYSIS AND OPINIONS

The security expert will determine the level of adequacy of security at the location of the incident on the date and at the time the incident occurred. This will be based on the information obtained in the previous steps, and the application of a qualitative analysis based on the experience, education, and training of the expert.

Based upon the analysis, the expert will reach conclusions on the issues of risk analysis, preventability, and the adequacy of the security program at the subject property. At this point the expert has formed opinions and is prepared to provide a written report, be deposed, and/or testify at trial. Those opinions will state the detailed basis for the findings, including evidence, standards, best practices, and guidelines, where applicable.

BIBLIOGRAPHY/REFERENCES

The process of evaluating the risk of crime at a specific location or geographical area is widely recognized and has been adopted nationwide by private industry, public law enforcement, municipalities, and other governmental agencies. The following published sources reference the process used to perform a crime risk analysis. *This is not all-inclusive, but a representative sampling of available references.*

This bibliography is not to be construed in any way as an endorsement by the International Association of Professional Security Consultants of the publications or the respective authors.

ASIS International (2003). *General Security Risk Assessment Guideline*. Alexandria, VA.

Bates, Norman D. (1997). "Foreseeability of Crime and Adequacy of Security," *Accident Prevention Manual for Business & Industry*, Security Management, National Safety Council.

Bates, Norman D. and Danielle A. Frank (2010). "Premises Security Experts and Admissibility Considerations Under Daubert

and Kumho: A Revised Standard," *Suffolk Journal of Trial and Appellate Advocacy*, June 2010.

Broder, James F. and Tucker, Eugene (2012). *Risk Analysis and the Security Survey, 4th Edition*. Boston, MA: Butterworth-Heinemann.

Bureau of Justice Statistics <http://www.bjs.gov/index.cfm?ty=tp&tid=941>

Caplan, Joel M., and Leslie W. Kennedy (2016). "Risk Terrain Modeling: Crime Prediction and Risk Reduction." Jackson, TN: University of California Press.

Clarke, Ronald V., & Eck, John E. (2007). "Understanding Risky Facilities. Problem Specific Guide Series. Washington, DC: Office of Community Oriented Policing," U.S. Department of Justice.

Crowe, Timothy D. and Fennelly, Lawrence (2013). *Crime Prevention Through Environmental Design, 3rd Edition*. National Crime Prevention Institute, Boston, MA: Butterworth-Heinemann.

Department of the Navy, Naval Facilities Engineering Command, (1983). *Physical Security Design Manual 13.1*, Washington, DC: Government Printing Office.

Eck, John E. and Weisburd, David (1995). *Crime and Place*. Monsey, NY: Criminal Justice Press (Police Executive Research Forum).

Eck, John E., Clarke, Ronald V., and Guerette, Rob T. (2007), "Risky Facilities: Crime Concentration in Homogeneous Sets of Establishments and Facilities" in Farrell, Graham et al, ed. *Imagination for Crime Prevention*, Crime Prevention Studies, Volume 21, Monsey, NY: Criminal Justice Press.

Eck, John E., & Weisburd, David (Eds.). (1995). "Crime and Place. Crime Prevention Studies" 4. Monsey, NY: Criminal Justice Press.

Gottlieb, Stephen, Sheldon Arenberg, and Raj Singh (1998). *Crime Analysis: From First Report to Final Arrest*. Montclair, CA: Alpha Publishing.

International Association of Crime Analysts (2009). *Exploring Crime Analysis*. 2nd Edition. Overland Park, KS: Book Surge Publishing.

Madensen, Tamara D. and John E. Eck (2013). "Crime Places and Place Management" in Cullen, F. T., & Wilcox, P. *The Oxford Handbook of Criminological Theory*. New York, NY: Oxford University Press.

Miethe, Terance D. and Richard McCorkle (2005). *Crime Profiles: The Anatomy of Dangerous Persons, Places, and Situations*. 3rd Edition. Los Angeles: Oxford University Press.

National Crime Prevention Institute (2001). *Understanding Crime Prevention*, Boston, MA: Butterworth-Heinemann.

Sennewald, Charles A. (2015). *Effective Security Management*. 6th Edition. Woburn: Butterworth-Heinemann.

Sennewald, Charles A. (2012). *Security Consulting*. 4th Edition. Woburn: Butterworth-Heinemann.

U.S. Army Corps of Engineers (1990). *Security Engineering Manual*, Missouri River Division/Omaha District.

U.S. Department of Justice, Federal Bureau of Investigation, "UCR: Uniform Crime Reporting Handbook" Revised 2004, U.S. Government Printing Office, Washington, DC.

U.S. Department of Justice (1995). "Vulnerability Assessment of Federal Facilities," Washington, DC: Government Printing Office.

Vellani, Karim H. (2020). *Strategic Security Management: A Risk Assessment Guide for Decision Makers*. 2nd Edition CRC Press.

Weisburd, David, Elizabeth Groff, and Sue-Ming Yang. (2012), *The Criminology of Place: Street Segments and Our Understanding of the Crime Problem*. Oxford: Oxford University

Press.

Weisburd, David, et al. (2016), *Place Matters: Criminology for the Twenty-First Century*. Cambridge: Cambridge University Press.

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CASES CITING METHODOLOGY

Childress v Kentucky Oaks Mall, 2007 WL 2772299 (W.D. KY) 2007

Reinaldo Robles DelValle, et al v Vornado Realty Trust, 06-1818USDist.Crt., Puerto Rico, 2009

Jane Doe v. AE Outfitters Retail Co., United States District Court for the District of Maryland, Northern Division, 2015

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Founded in 1984, the International Association of Professional Security Consultants (IAPSC) is a widely recognized and respected association committed to establishing and maintaining the highest standards for security consultants in the industry. IAPSC members are independent, non-product affiliated consultants who are required to meet strict educational, experience, and practice requirements, ensuring that they uphold the IAPSC code for professionalism and ethical conduct. For more information, to find an IAPSC security consultant, or to become a member of the association, visit www.iapsc.org.